



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 19 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7679 6583
RETURN RECEIPT REQUESTED

Mr. Jan M. Smit
Compliance Director
WRR Environmental Services Company, Inc.
5200 Ryder Road
Eau Claire, Wisconsin 54701

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
WRR Environmental Services Company, Inc., Eau Claire, Wisconsin
WID 990 829 475

Dear Mr. Smit:

On August 13, 2013, representatives of the U.S. Environmental Protection Agency inspected the WRR Environmental Services Company, Inc. (WRR) facility, located at 5200 Ryder Road, Eau Claire, Wisconsin. One purpose of the inspection was to evaluate WRR's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation of hazardous waste, compliance with WRR's RCRA license, universal waste, and used oil. We have enclosed a copy of the inspection report for your reference. EPA acknowledges receiving an e-mail from you on September 4, 2013.

Based on information provided by WRR personnel, a review of records, and personal observations by the inspectors, EPA finds that WRR violated certain requirements of the Wisconsin Administrative Code (WAC), RCRA Hazardous Waste License, and the United States Code of Federal Regulations (CFR). We find that WRR was not in compliance with the following hazardous waste requirements:

1. The owner or operator must inspect the facility for malfunctions and deterioration, operator errors and discharges which may be causing, or may lead to, release of hazardous waste constituents to the environment or a threat to human health. The owner or operator must conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment. See, WAC § NR 664.0015(1) [40 CFR § 264.15(a)]. Specifically, the owner or operator must record inspections in an inspection log or summary and must keep these records for at least 3 years from the date

of the inspection. At a minimum, these records must include the date and time of the inspection, the name of the inspector, a notation of the observations made and the date and nature of any repairs or other remedial actions. See, WAC § NR 664.0015(4) [40 CFR § 264.15(d)]. The WDNR Hazardous Waste License Renewal: Determination to Approve a Feasibility Report and Plan of Operation Report (FPOR) specifies that WRR must comply with all applicable requirements of WAC Chapters NR 600 through 690. See, WRR Environmental Services FPOR.

During the records review portion of the inspection, the inspectors observed that the facility inspection logs did not include the time of the inspection. WRR, therefore, failed to comply with the above-mentioned RCRA license requirement for recording inspections, as required by WAC § NR 664.0015(4) [40 CFR § 264.15(d)].

2. If a facility receives hazardous waste accompanied by a manifest, the owner or operator, or an agent, shall sign and date each copy of the manifest as indicated in paragraph (b) to certify that the hazardous waste was received except as noted in the discrepancy space of the manifest, or that the hazardous waste was rejected as noted in the manifest discrepancy space. See, WAC § NR 664.0071(1) [40 CFR § 264.71(a)]. Upon discovering a significant discrepancy, the owner or operator must attempt to reconcile the discrepancy with the waste generator or transporter (e.g., with telephone conversations). If the discrepancy is not resolved within 15 days after receiving the waste, the owner or operator must immediately submit to WDNR a letter describing the discrepancy and attempt to reconcile it, and a copy of the manifest or shipping paper at issue. See, WAC § NR 664.0072(3) [40 CFR § 264.72(c)]. In addition, if a facility receives hazardous waste imported from a foreign source, the owner or operator of the receiving facility must mail a copy of the manifest to the following address within 30 days of delivery: International Compliance Assurance Division, OFA/OECA (2254A), U.S. Environmental Protection Agency, Ariel Rios Building, 1200 Pennsylvania Avenue, NW., Washington, DC 20460. See, WAC § NR 664.0071(1)(c) [40 CFR 264.71(a)(3)].

During the records review portion of the inspection, the inspectors reviewed an August 8, 2013 hazardous waste manifest for a shipment of 90 drums (34,213 pounds) of Waste Paint Related Material (F003/F005/D001/D018/D035) from WRR Environmental Services, Eau Claire, Wisconsin (WID990829475) to WRR Environmental Services, Eau Claire, Wisconsin (WID990829475), see manifest number 006716043 FLE. WRR personnel told the inspectors that the shipment was from GFL Environmental, Inc., Winnipeg, Manitoba (NDC980000491). WRR submitted a Letter of Discrepancy to WDNR on August 27, 2013. WRR did submit manifest number 0006716043 FLE to EPA Headquarters. However, it was a copy of the original manifest showing shipment from WRR, Eau Claire to WRR, Eau Claire.

3. A large quantity handler of universal waste must label or mark each lamp or a container or package in which the lamps are contained must be labeled or marked clearly with the phrase "Universal Waste – Lamps", "Waste Lamps" or "Used Lamps". See, WAC § NR

673.34(5) [40 CFR § 273.34(e)]. A large quantity handler of universal waste may accumulate universal waste for no longer than one year from the date the universal waste is generated, or received from another handler. See, WAC § NR 673.35(1) through (3) [40 CFR § 273.35 (a) through (c)].

During the inspection of Building A, the inspectors observed several containers of used fluorescent lamps, see photograph number 11. The inspectors observed one container dated 11/3/2011. During the records review portion of the inspection, the inspector asked where the universal waste lamps were shipped. WRR personnel told the inspectors that the used lamps are shipped to Lamp Recyclers, Green Bay, Wisconsin. In addition, the inspectors observed Bills of Lading for shipments of used fluorescent lamps to WRR. At the time of the inspection, WRR failed to comply with the large quantity handler accumulation requirements, as required by WAC §§ NR 673.35(1) through (3) [40 CFR § 273.35(a) through (c)].

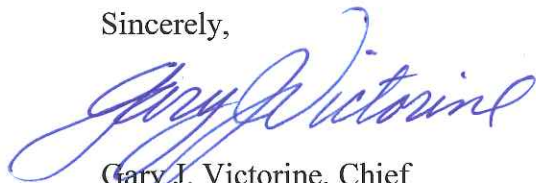
4. Used oil generators are subject to all applicable Spill Prevention Control and Countermeasures requirements at 40 CFR Part 112 in addition to the requirements of WAC Chapter 679 Subchapter C and 40 CFR Part 279, Subpart C. Containers and aboveground storage tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, WAC § NR 679.22(3) [40 CFR § 279.22(c)(1)].

During the inspection of the E-1 South Dike Loc Forge Tank Farm, the inspectors observed Tank WW which was not labeled "Used Oil", see photograph number 15. At the time of the inspection, WRR failed to comply with the used oil generator labeling requirements as required by WAC § NR 679.22(3) [40 CFR § 279.22(c)(1)]. Subsequently, WRR personnel labeled Tank WW during the inspection, see photograph number 20. EPA considers this violation resolved.

Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928, EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that WRR submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

If you have any questions regarding this letter, please contact Walt Francis, of my staff, at (312) 353-4921.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosures

cc: Scott Szymanski, WDNR-Black River Falls Office
(scott.szymanski@wisconsin.gov)
Michael Ellenbecker, WDNR-Sturtevant Service Center
(michael.ellenbecker@wisconsin.gov)
Thomas Williams, EPA Region 5
(williams.thomas@epa.gov)
John Gierczak, EPA Cleveland Office
(gierczak.john@epa.gov)

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

FACILITY NAME: WRR ENVIRONMENTAL SERVICES COMPANY,
INC.

FACILITY U.S. EPA ID NO.: WID 990 829 475

FACILITY TYPE: Large Quantity Generator, Container and Tank
Storage, Thin Film Evaporation Treatment, and Other
Treatment Unit

FACILITY ADDRESS: 5200 Ryder Road
Eau Claire, Wisconsin 54701

U.S. EPA REPRESENTATIVE: Walt Francis

DATE(S) OF INSPECTION: August 13 and 14, 2013

SIC CODE: 4953 – Refuse Systems

NAICS CODE: 56211 – Hazardous Waste Treatment and Disposal

PREPARED BY: Walt Francis
Walt Francis
Environmental Scientist

9/4/2013
Date

ACCEPTED BY: Mirtha Capiro
Mirtha Capiro, Acting Chief
Compliance Section 2
RCRA Branch

09/06/13
Date

Purpose of Inspection

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the WRR Environmental Services Company, Inc. facility (WRR), Eau Claire, Wisconsin to determine its compliance with the Resource Conservation and Recovery Act (RCRA), the Wisconsin Administrative Code (WAC), and the RCRA License requirements with respect to WRR's management of hazardous waste, universal waste and used oil as part of a multimedia inspection.

Participants

U.S. Environmental Protection Agency (U.S. EPA) Inspectors –
Meghan Dunn, Environmental Scientist
Walt Francis, Environmental Scientist
John Gierczak, Environmental Engineer
Charlie Hall, Environmental Engineer

Representatives of WRR -
Jim Hager, President and CEO
Jan Smit, Compliance Director
Eric Gunderson, Vice President Research and Development
Mark Gasser, Mechanical Engineering
Rebecca Anderson, Operational Support Manager
Eric Neff, Process Engineer
Bill Tealey, Computer and Safety
Bob Fuller, Chief Financial Officer
Jasmine Sodemann, Environmental Specialist Gannett Fleming

Site Description/Background Information

WRR provides services in the areas of solvent recycling, wastewater treatment, fuel blending, emergency spill response, remediation, community clean sweeps, and other hazardous waste treatment and storage activities for a variety of hazardous waste and non-hazardous waste generators throughout the Midwest and Canada. The property is located within the Town of Washington, Eau Claire County, Wisconsin, in an area zoned heavy industrial and occupies approximately 8.2 acres. The site is surrounded by areas zoned for industrial, light industrial, residential and forestry uses.

The hazardous wastes stored or treated at the WRR facility include: spent solvents (paint gun flush, acetone, ketone, etc.); acids; bases; lab packs; used oils; wastewater; and solid wastes (high flash mineral spirits). The majority of the wastes are solvents. Approximately, 90% of the waste brought into WRR is processed there with the remaining 10% being sent on for further treatment.

Approximately 75% of the solvents are reclaimed and recycled onsite.

The facility stores hazardous waste in 40 tanks, 3 overflow tanks and 12 container storage areas under its license. In addition, the operating license allows for treatment to occur in a Thin-Film Evaporator (TFE). Additionally, fuel blending of containerized liquids occurs in the Hydra Pulper in the Fuels Building.

WRR personnel complete a waste profile, and assign a process code for each incoming waste stream. Incoming waste shipments are received at Docks 1, 4 or 5. Each container is tested at the WRR on-site laboratory, including EPA Method 8082 for PCBs. Other incoming wastes include: F-listed wastewater and other wastewaters, used antifreeze, universal waste lamps and batteries, and lab packs. WRR also dehydrates ethanol and isopropyl alcohol and manufactures a Teflon lubricant component, lactic acid and several intermediate products for other customers.

WRR generated hazardous wastes are primarily shipped to Green America Recycles, Hannibal, Missouri (MOD054018288), 3M Cottage Grove, Cottage Grove, Minnesota (MND006172969), Clean Harbors Deer Trail, LLC, Deer Trail, Colorado (COD991300484), and Clean Harbors of Baltimore, Inc., Baltimore, Maryland (MDD980555189) via truck or by rail. WRR operates a rail transfer facility in Bloomer, Wisconsin. WDNR provided U.S. EPA with a manifest tracking report for the period 1/30/2013 to 7/30/2013 for off-site shipments of hazardous waste. For the period 5/20/2013 to 6/20/2013, WRR shipped 1,030,581 pounds of hazardous and non-hazardous wastes off-site. In addition, used oil is accumulated on-site in Tank WW and universal waste is sent off-site to Lamp Recyclers, Inc., Green Bay, Wisconsin (WIR000125831).

On April 19, 2013 WRR submitted a RCRA permit renewal package to WDNR in response to the WDNR April 23, 2012, license call-in letter. The current WRR RCRA license issued by WDNR expires September 30, 2013.

Opening Conference

On August 13, 2013, Walt Francis, John Gierczak, Charlie Hall, and Meghan Dunn arrived at the WRR facility at approximately 8:15 a.m. The receptionist directed the group to a second floor conference room. John Gierczak introduced himself and the EPA inspectors and Mr. Jim Hager introduced the WRR representatives and the Gannett Fleming representative. John Gierczak informed the WRR representatives of the nature, scope, and procedures for the multimedia inspection. The multimedia inspection was conducted by U.S. EPA. WDNR personnel were unable to participate in the inspection. The facility representatives provided the team with a plant description, plant diagram, incoming waste protocols, sampling, various treatment options (TFE, fractionation tower, fuel blending hydra pulper), and off-site shipments of products and waste. In addition, Ms. Anderson provided a description of current hazardous waste satellite accumulation area (SAA) containers, hazardous waste less than 90 day accumulation areas, universal waste accumulation areas, used oil tank, household hazardous waste accumulation area, and licensed

storage and treatment areas. Mr. Jim Hager allowed the inspectors access to the facility to conduct the inspection.

Site Tour

The walk-through began in the fleet truck incoming waste area. Ms. Anderson showed the inspectors the procedure for placing the load number and barrel number on each container. The walk-through continued to the F-4 Fractionalization still and PR-1 Reactor and Pilot Scale Reactor. The walk-through continued to an area where Ms. Anderson told the inspectors that incoming loads of waste are staged along the North fence. Inspector Francis observed a transport vehicle with the name Coal City Cobb, Coal City, Illinois on the side. The walk-through continued to a tank farm. Ms. Anderson told the inspectors that waste tanks have letters and product tanks have numbers on each tank. The walk-through continued to the E1 Sludge Tank System area. Mr. Hager introduced Mr. Dean Sabin, Plant Manager to the group. Ms. Anderson told the group that the E-1 Sludge Tank system includes a hazardous waste water tank and a tank for residuals from the TFE. Inspector Francis asked Ms. Anderson about conservation vents on the tanks. Ms. Anderson told Inspector Francis that all the tanks had conservation vents and any accumulated rain water is collected and analyzed by the on-site laboratory. Ms. Anderson told the inspectors that residuals from the TFE can be routed to the E-2 Tank area, E-1 South tank area or E-1 process area and then to a cement kiln via rail car or truck. The walk-through continued to the Product Tank farm and E-II dike area. Ms. Anderson told the group that all tanks had "Level 1" conservation vents, which included multi component blend solvents, delta tank for ethanol, and a denatured alcohol tank. The walk-through continued to the pads area. Ms. Anderson showed the inspectors P-1 which was for D003 reactive hazardous waste. Inspector Francis noted that pads P-15, P-16, and P-17 were empty. The walk-through continued to the Tanker Bays 1 and 2 at the east end of Dock 4. Ms. Anderson explained that hazardous or non-hazardous waste is sampled and pumped out through pumping station number 3. Ms. Anderson pointed out a filter basket strainer and a 55-gallon SAA container in this area. The walk-through continued to the Fuels Building. Mr. Hager showed the inspectors where the drums were staged, a device to open the drums, barrel punch, pusher and crusher, and a paint can crusher, the 4,000 gallon hydropulper. Mr. Hager explained the hydropulper process and subsequent pumping to a tanker truck. Mr. Hager also showed the inspectors two carbon canister devices outside connected to the outside dumpster. The walk-through continued to the CC-7 Control Room. Ms. Anderson showed the group two additional tanks and a display of current Fuels Building parameters. The walk-through continued outside where Mr. Hager showed the inspectors the old incinerator primary and secondary combustion chambers. The walk-through continued to the E-2 Sludge Tank Farm dike area. Ms. Anderson showed the inspectors several 12,000 gallon, 9,000 gallon, 4,500 gallon tanks, a residual tank Tank R, and an overflow tank. Ms. Anderson told the inspectors that LDAR measurements are taken in this area by Mr. Dean Sabin and Mr. Jan Smit. The walk-through continued to the Poly Lactic Acid (PLA) Reactor. Ms. Anderson explained the process for making PLA to the inspectors. The walk-through continued to the R-18 Reactor. Ms. Anderson told the inspectors that this was a Research and Development project to polymerize vegetable oil. Inspector Francis observed a SAA container in

this area. Ms. Anderson told the inspectors that a sludge is collected on filters in this area. The walk-through continued to TFE E-23. Ms. Anderson explained the TFE process including the flush tank. Ms. Anderson also showed the inspectors the ketol process two reactors. Ms. Anderson told the inspectors that socks, hazardous waste D001/D035 is generated at the R-1 reactor. Inspector Francis observed a 55-gallon SAA container in this area. The inspection continued to the TFE E-4 area. Inspector Francis observed a 55-gallon SAA container and several buckets in this area. The walk-through continued to the Fractionation system F-2 and F-3 and molecular sieve area. Inspector Francis observed two 55-gallon SAA containers in this area. The walk-through continued to Building E-1, Wood Shop. Ms. Anderson showed the inspectors several tanks (WWT2, WWT3, and WWT4) which are utilized for non-hazardous waste. Ms. Anderson told the inspectors that the wastewater is shipped to Bloomer or Thorpe, Wisconsin POTWs for disposal. The walk-through continued to the Boiler house. Mr. Hager showed the inspectors the #4 Boiler which runs on natural gas, but can be switched over to #6 fuel oil. The walk-through continued to Building A. Ms. Anderson showed the inspectors the universal waste used fluorescent lamp accumulation area. Inspector Francis observed several 4 foot and 8 foot containers of used lamps, with accumulation dates of 11/3/2011 and 2/27/2013. The walk-through continued to the SK Dike tank farm area. Ms. Anderson told the inspectors that Tanks SK7 and SK2 contained POTW water. The walk-through continued back to the E-1 South Loc Forge tank area. Ms. Anderson pointed out Tank WW which holds used oil and has a capacity of 14,850 gallons. Inspector Francis noted that he tank was not labeled "Used Oil". The inspection group then returned to the WRR conference room and discussed the next days' activities.

On Wednesday August 14th at approximately 8:15 a.m. the inspectors returned to the WRR facility. Inspector Francis told the WRR representatives that he would like to inspect the RCRA areas and take photographs. Mr. Hager and Ms. Anderson took inspectors Gierczak, Hall, and Francis to the on-site laboratory. Ms. Anderson introduced Mr. Roger Brian, Laboratory Manager. Mr. Brian showed the inspectors three 55-gallon SAA containers for separate waste streams, see photograph number 2. Outside of the laboratory, Mr. Hager showed the inspectors two 55-gallon less than 90 day hazardous waste containers that were connected with hoses to drains in the laboratory. Inspector Francis observed that the 55-gallon containers were labeled "F005/F003/D001/D035" and dated "8/9/2013", see photograph number 1. The walk-through continued to Tank farm E-1 North, see photograph number 3. The walk-through continued to the household hazardous waste clean sweep collection/accumulation area. Inspector Francis observed a number of 55-gallon containers, see photograph number 4. The walk-through continued to the sheds area. Mr. Hager opened shed P-1. Inspector Francis observed a 55-gallon container labeled "D001, 7/31/2013" (see photographs number 5, 18, and 19), and several boxes labeled "Universal Waste and various boxes of computer parts. Mr. Hager opened shed P-2 and showed the inspectors several containers of activated carbon. Mr. Hager told the inspectors that the activated carbon was not a waste. Mr. Hager opened shed P-3 which contained non-hazardous waste reacted monoliths, see photograph number 6. Mr. Hager opened sheds P-4 and P-5 which were empty. Mr. Hager opened shed P-6, which contained gaylord boxes from Brenntag Great Lakes. Mr. Hager opened shed P-7, which contained approximately twenty 55-gallon containers of hazardous waste. Inspector Francis observed a 55-gallon container labeled

"D001/D018/D035/D007" with a 4/26/2013 accumulation date. Mr. Hager opened shed P-8 which was labeled "oxidizers". Inspector Francis observed various drums and totes. Mr. Hager opened shed P-9. Inspector Francis observed a container labeled "Non-Hazardous Waste, Load Number 132637, Profile 03-00812 Lot E, Barrel #65". Mr. Hager opened shed P-10 which was labeled "Acid and Bases". Inspector Francis observed six 55-gallon containers labeled "D002, 7/11/2013". Mr. Hager told the inspectors that these containers would be shipped off-site. The walk-through continued to Tanker Bays, North Bay 1 and South Bay 2. Ms. Anderson explained the process of loading and cleaning tanker trucks in these areas and that the emissions were vented to the CC7 system. The walk-through continued to Dock 5. Ms. Anderson showed the inspectors various totes and drums, see photograph number 7. Inspector Francis observed a 55-gallon container labeled "Brenntag, F003/D035/D005, 8/21/3 ". Ms. Anderson also showed the inspectors two totes of "Hot Soap" cleaning solution that is utilized in the tanker truck washing process. The walk-through continued to the barrel dumpster outside of the Fuels Building, see photograph 8. The walk-through continued to the "Turbo Stripper" on the south side of the property. Mr. Hager showed the inspectors the turbo stripper, collection pit and aeration basin. Inspector Gierczak followed the discharge pipe to the edge of the WRR property, see photographs number 9 and 10. The walk-through continued to the universal waste accumulation area. Ms. Anderson showed Inspector Francis a number of 4-foot and 8-foot boxes of used fluorescent lamps, see photograph number 11. Inspector Francis noted an accumulation date of 8/14/2013 on one of the boxes. The walk-through continued to the hydra-pulper area. Mr. Hager explained the hydra-pulper operations and told the inspectors it operated under a nitrogen atmosphere, see photograph number 12. The walk-through continued to the E-4 Slurry Tank farm, E-II Sludge Dike (see photograph number 13), and the E-4 TFE unit, see photograph number 14. The walk-through continued to Tank WW in the E-1 South Dike Loc Forge tank farm. Inspector Francis asked Ms. Anderson about Tank WW. Ms. Anderson told Inspector Francis that it contained used oil. Inspector Francis noted that the tank was not labeled "Used Oil", see photograph number 15 (Tank WW was labeled "Used Oil" later in the day on 8/14/2013, see photograph number 20). The walk-through continued to the E-1 North Dike Tank farm, see photographs number 16 and 17. The walk-through continued to the "DOT Room". Mr. Hager explained to the inspectors that Wisconsin DOT painting trucks used to be cleaned in the "DOT Room". Mr. Hager showed the inspectors three 55-gallon less than 90 day hazardous waste dated 8/9/2013. The walk-through continued to the "3M Room". Mr. Hager explained that the 3M Room was a materials storage room. The walk-through continued to Dock 6 and Dock 7. Mr. Hager showed the inspectors outgoing products. Inspector Francis observed 55-gallon containers labeled "Lithosolve", "Lacquer Thinner", "N-Propyl Bromide", and "RC Acetone". The walk-through continued to the Maintenance Shop.

The inspectors then returned to the conference room to review records.

Records Review

A record review was conducted. The inspection team requested to review incoming and outgoing hazardous waste manifests, land disposal restriction forms, universal waste and used oil shipping

records, personnel training information, weekly and daily inspection logs, waste profiles for hazardous waste in storage, tank assessment information, and the latest version of the contingency plan. The inspectors reviewed hazardous waste manifests since the date of the last inspection, two years of personnel training records, waste profiles, daily and weekly inspection records. The inspectors reviewed hazardous waste manifests. Specifically, the inspectors reviewed an in-bound hazardous waste manifest dated 8/7/2013 of thirty-one 55-gallon containers of F034 hazardous waste from Stella Jones Bangor which arrived 8/8/2013, manifest number 006716290FLE. Also, Inspector Francis reviewed a 8/8/2013 manifest from Brenntag Great Lakes of eighteen barrels labeled F003/F005 "Shredded Solids-Fuel Blending" and a manifest from WRR Environmental to WRR Environmental dated 8/8/2013. Out-going manifests included shipments to Ross Incineration, Clean Harbors Baltimore, and Green America Recycling. Inspector Francis reviewed the January 2003 Waste Analysis Plan and a November 2008 version of the Contingency Plan. Inspector Francis reviewed the daily and weekly inspection logs. Inspector Francis noted that the inspection logs did not include the time of the inspection. Inspector Francis reviewed two years of personnel training records, which included Bill Tealey, William Stark, and Richard Klingbeil. Universal Waste was being shipped to Lamp Recyclers, Inc., Green Bay, Wisconsin, and the date of the last off-site shipment was 7/24/2013. Used oil was shipped to Lube Tech Liquid Recycling, Roseville, Minnesota. Inspector Francis reviewed the tank assessments dated 5/23/2013 which included information on overfill protection and overfill alarms. In addition, Inspector Francis reviewed the operating record to see if any hazardous waste had been in storage for greater than one year. No waste had been stored for greater than one year.

Closing Conference

The inspectors conducted a closing conference. Inspector Francis explained that he would review his notes from the inspection, and generate an inspection report. WRR Environmental would then receive a letter from U.S. EPA regarding the inspection including a copy of the inspection report, completed inspection checklists, and inspection photographs. Inspector Francis discussed manifests, used oil tank labeling, and inspection logs.

Attachments

Inspection Checklists.



TREATMENT & STORAGE FACILITY INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities having a hazardous waste license to store and/or treat hazardous waste, evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Received from Off-Site

A. Each manifest is signed and dated to certify receipt.	Y	664.0071(1)(a) Photo <input type="checkbox"/>
B. Significant manifest discrepancies are noted, if applicable. <i>e/e/13 - manifest</i>	Y	664.0071(1)(b)2 Photo <input type="checkbox"/>
C. A copy of the signed manifest is provided to the transporter.	Y	664.0071(1)(b)3 Photo <input type="checkbox"/>
D. A copy of the signed manifest is sent to the generator within 30 days.	Y	664.0071(1)(b)4 Photo <input type="checkbox"/>
E. A copy of the signed manifest is sent to the Department within 45 days.	Y	664.0071(1)(b)4 Photo <input type="checkbox"/>
F. A copy of the signed manifest is retained on-site for at least three years.	Y	664.0071(1)(b)5 Photo <input type="checkbox"/>
G. If a significant manifest discrepancy is noted, the facility attempts to reconcile the discrepancy with the generator or transporter.	Y	664.0072(3) Photo <input type="checkbox"/>
H. If there is no resolution within 15 days of receiving the waste, the facility immediately submits a letter to the Department describing the situation and a copy of the manifest.	N	664.0072(3) Photo <input type="checkbox"/>

19 days - letter to WIS

Section 2: Rejected Shipments of Waste or Excess Residue in Containers

A. Facility has rejected shipments of hazardous waste or received containers with residues exceeding quantity limits for empty containers. If No, go to Section 3. <i>Rejected Shipments 2006 - TCE</i>	Y	Photo <input type="checkbox"/>
B. Facility consulted with the generator before forwarding the waste to another facility.	Y	664.0072(4)(a) Photo <input type="checkbox"/>
C. Facility returns the rejected waste or residue to the generator when they can not forward the waste to an alternate facility.	Y	664.0072(4)(a) Photo <input type="checkbox"/>
D. Facility sends the waste to an alternate facility or the generator within 60 days of rejection or identifying the excess container residue.	Y	664.0072(4)(a) Photo <input type="checkbox"/>
E. Facility ensures the delivering transporter retains custody of the waste.	Y	664.0072(4)(b) Photo <input type="checkbox"/>
F. Facility provides secure, temporary custody of the waste before delivery to the first transporter.	Y	664.0072(4)(b) Photo <input type="checkbox"/>
G. Facility complies with the following if they use the original manifest to reject a full load to an alternate facility before the transporter leaves: 1. The facility forwards the rejected shipment to an alternate facility identified in Item 18b. 2. The facility keeps one copy of the manifest for their records and gives the other copies to the transporter.	Y	664.0072(5)(g) Photo <input type="checkbox"/>



TREATMENT & STORAGE FACILITY INSPECTION

Division: 03/19/2012
WASTE & MATERIALS
MANAGEMENT PROGRAM

Section 2: Rejected Shipments of Waste or Excess Residue in Containers

H. Facility complies with the following if they use the original manifest to return a rejected shipment to the generator before the transporter leaves: 1. Complete items 18a and 18b, using the generator's information as the alternate facility. 2. Retain one copy of the manifest and give the other copies to the transporter.	Y	664.0072(6)(g) Photo <input type="checkbox"/>
I. Facility complies with the following if they return a rejected waste to the transporter or generator after the manifest has been signed and dated: 1. Amend their copy of the manifest by indicating the rejected waste or residue in the discrepancy space of the manifest. 2. Copy the manifest tracking number from Item 4 of the new manifest to the discrepancy space of the amended manifest. 3. Re-sign and date the manifest to certify the amended information. 4. Retain a copy of the amended manifest for at least 3 years from the date of the amendment. 5. Send a copy of the amended manifest to the transporter, generator, and department within 30 days.	Y	664.0072(7) Photo <input type="checkbox"/>
J. Facility complies with the following for other rejected waste or residues sent to an alternate facility: 1. Prepare a new manifest according to the appendix in 40 CFR part 262. 2. Write the generator's EPA ID #, name and address on the manifest in Items 1 and 5. 3. Write the alternate designated facility and EPA ID # in Item 8. 4. Copy the manifest tracking number in Item 4 of the old manifest to the special handling block in Item 14 and indicate the shipment is a residue or rejected waste. 5. Copy the manifest tracking number in Item 4 of the new manifest to the manifest reference number in Item 18a of the old manifest. 6. Write the DOT description in Item 9, including container types, quantity and volume of waste. 7. Sign the certification in Item 15 as the offerer of the shipment.	Y	664.0072(5) Photo <input type="checkbox"/>
K. Facility complies with the following for other rejected waste or residues sent back to generator: 1. Prepare a new manifest according to the appendix in 40 CFR part 262. 2. Write the facility's EPA ID# in Item 1 and the generator's name and address in Item 5 of the new manifest. 3. Write the name and EPA ID# of the initial generator as the designated facility in Item 8. 4. Copy the manifest tracking number in Item 4 of the old manifest to the special handling block in Item 14 of the new manifest and indicate the shipment as a residue or rejected waste. 5. Copy the manifest tracking number in Item 4 of the new manifest to the manifest reference line in the discrepancy block of the old manifest in Item 18a. 6. Write the DOT description in Item 9, including container types, quantity and volume of waste. 7. Sign the certification in Item 15 as the offerer of the shipment.	Y	664.0072(6) Photo <input type="checkbox"/>

Section 3: Waste Analysis Requirements

A. Before treatment or storage, the facility obtains a detailed chemical and physical analysis of all incoming wastes.	Y	664.0013(1)(a) Photo <input type="checkbox"/>
B. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. <i>C18026530 - WAB</i>	Y	664.0013(1)(a)1 Photo <input type="checkbox"/>
C. Waste analysis is repeated when EITHER of the following occurs: 1. The process generating the waste has changed. 2. The shipment received does not match the waste designated on the manifest.	Y	664.0013(1)(c) Photo <input type="checkbox"/>
D. Facility follows the stated procedures to inspect and, if necessary, analyze each incoming waste shipment to determine if the incoming waste matches the waste specified on the manifest.	Y	664.0013(3) Photo <input type="checkbox"/>



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Section 3: Waste Analysis Requirements

E. Facility follows their written waste analysis plan by performing ALL of the following:

1. Test the waste for the stated parameters.
2. Use the stated test methods for each of the parameters.
3. Use the designated sampling methods to obtain representative samples.
4. Review or repeat the initial analysis according to stated frequencies.
5. For off-site facilities, maintain waste analysis records supplied by generators.

Y

664.0013(2)

Photo ☐

Section 4: Waste Generated On-Site and Waste Shipments

A. A hazardous waste determination has been made on each solid waste generated.

Y

662.011

Photo ☐

B. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. *Also had some verification - western states.*

Y

662.011(3)(a)

Photo ☐

C. Waste determinations are made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.

Y

662.011(3)

Photo ☐

D. Records of all waste determinations are kept on-site for at least 3 years from the date the waste was last sent to a storage, treatment or disposal facility.

Y

662.040(3)

Photo ☐

E. A manifest is initiated with all off-site shipments of hazardous waste.

Y

662.020(1)

Photo ☐

F. The manifest is used according to the instructions in the appendix to 40 CFR part 262.

Y

662.020(1)

Photo ☐

G. The facility designated on the manifest is permitted or licensed to accept the waste.

Y

662.020(2)

Photo ☐

H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.

Y

662.023(3)

Photo ☐

I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.

Y

662.020(1)

Photo ☐

J. Copy of the manifest signed by the facility is retained until the signed copy from the designated facility is received.

Y

662.040(1)

Photo ☐

K. Copy of each manifest is kept for at least three years from the date of shipment.

Y

662.040(1)

Photo ☐

L. Transporter or TSD is contacted if the signed manifest is not received in 35 days.

Y

662.042(1)

Photo ☐

M. Exception report is submitted to the Department if signed manifest is not received within 45 days.

Y

662.042(2)

Photo ☐



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Section 4: Waste Generated On-Site and Waste Shipments

N. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030 Photo <input type="checkbox"/>
O. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031 Photo <input type="checkbox"/>
P. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1) Photo <input type="checkbox"/>
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2) Photo <input type="checkbox"/>
R. Placards are offered to the initial transporter.	Y	662.033 Photo <input type="checkbox"/>

Section 5: Land Disposal Restrictions

A. Facility has determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo <input type="checkbox"/>
B. Facility complies with the prohibition against dilution of wastes.	Y	668.03 Photo <input type="checkbox"/>
C. A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo <input type="checkbox"/>
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo <input type="checkbox"/>
E. If the waste MEETS treatment standards, the LDR notice certifies the waste may be land disposed without further treatment.	Y	668.07(1) Photo <input type="checkbox"/>
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and application prohibitions.	Y	668.07(1) Photo <input type="checkbox"/>
G. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo <input type="checkbox"/>
H. Generator has identified the treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code, when waste is both a listed and characteristic waste OR has identified the treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2) Photo <input type="checkbox"/>
I. Each container is clearly marked to identify its contents.	Y	668.50(1)(b) Photo <input type="checkbox"/>
J. Each container is marked with the date on which each period of accumulation began.	Y	668.50(1)(b) Photo <input type="checkbox"/>



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Section 5: Land Disposal Restrictions

J. Waste is stored for 1 year or less. <i>Protest. 2 yr - ok</i>	Y	668.50(2)	Photo <input type="checkbox"/>
K. If waste is stored for more than 1 year, the facility can prove that storage is necessary to facilitate proper recovery, treatment or disposal.	N/A	668.50(3)	Photo <input type="checkbox"/>

Section 6: Recordkeeping and Reporting

A. An operating record is maintained at the facility.	Y	664.0073(1)	Photo <input type="checkbox"/>
B. The operating record contains ALL of the following information, as applicable: 1. Description and quantity of each waste received. 2. Method and date of each wastes treatment, storage or disposal. 3. Location and quantity of each hazardous waste within the facility. 4. Records and results of the waste analysis performed. 5. Summary reports and details of all incidents that required implementation of the contingency plan. 6. Closure cost estimates and any changes that are made in these estimates. 7. Other monitoring, analytical data and testing, as required. 8. For off-site storage and treatment facilities, a copy of the LDR notice required by the generator or the owner/operator. 9. For on-site storage and treatment facilities, the information contained in the LDR notice, except the manifest number, required by the generator or owner/operator.	Y	664.0073(2)	Photo <input type="checkbox"/>
C. Documents in the operating record are maintained until closure of the facility.	Y	664.0073(2)	Photo <input type="checkbox"/>
D. Annual reports covering facility activities during the previous calendar year are submitted to the Department by March 1 of the following year.	Y	664.0075	Photo <input type="checkbox"/>
E. Facility submitted an unmanifested waste report within 15 days if the facility received a waste from an off-site source without an accompanying manifest or shipping paper AND the waste is not excluded from manifest requirements due to VSQG status. <i>Not a facility</i>	Y	664.0076	Photo <input type="checkbox"/>
F. Annual reports and unmanifested waste reports are available for inspection.	Y	664.0074(1)	Photo <input type="checkbox"/>

Section 7: Preparedness and Prevention

A. Facility is equipped with ALL of the following, unless the equipment is not necessary for the types of wastes handled: 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	664.0032	Photo <input type="checkbox"/>
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Section 7: Preparedness and Prevention

B. Emergency equipment listed in Question 7.A is tested and maintained to assure its proper operation in an emergency.	Y	664.0033 Photo <input type="checkbox"/>
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas.	Y	664.0034 Photo <input type="checkbox"/>
D. Facility has made ALL of the following arrangements with emergency organizations: 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the facility layout, hazards of the waste handled, places where personnel work, entrances and roads in the facility and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	664.0037 Photo <input type="checkbox"/>
E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment.	Y	664.0035 Photo <input type="checkbox"/>

Section 8: Contingency Plan

A. Facility has a written contingency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge. <i>NOV 2008, 2011 Revision</i>	Y	664.0051 Photo <input type="checkbox"/>
B. Facility amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions.	Y	664.0052(2) Photo <input type="checkbox"/>
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams.	Y	664.0053(2) Photo <input type="checkbox"/>
D. Contingency plan was amended due to ANY of the following: 1. Facility license was revised. 2. Contingency plan failed in an emergency. 3. Changes in site design, construction, O&M, or other circumstances affect emergency response. 4. Emergency coordinators changed. 5. Emergency equipment changed.	Y	664.0054 Photo <input type="checkbox"/>
E. Contingency plan identifies an emergency coordinator who meets ALL of the following: 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	664.0055 Photo <input type="checkbox"/>



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Section 8: Contingency Plan

F. Contingency plan includes ALL of the following:

1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility.
2. Name, address and phone number, office and home, for each emergency coordinator.
3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services.
4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. *G-1 OK*
5. Actions facility personnel will take in response to a fire, explosion or hazardous waste discharge.
6. List of emergency equipment at the facility including location, description, and capabilities of each item. *OK*

Y

664.0052

Photo ☐

G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous waste:

1. Activate internal alarms or communication systems.
2. Notify appropriate authorities, if their help is needed.
3. Identify the character, source, amount, and extent of discharged hazardous materials.
4. Assess hazards to human health and the environment.
5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003).
6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread.
7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the facility stops operation.
8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material.
9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed.
10. Ensure that emergency equipment is clean and fit for use prior to resuming operations.
11. Notify the department and appropriate state and local authorities before resuming operations.
12. Submit an incident report to the department within 15 days.

Y

664.0056

Photo ☐

Section 9: Security and General Inspection Requirements

A. Facility has EITHER of the following to prevent the unknowing entry and minimize the unauthorized entry of persons or livestock onto active portions of the site:

1. 24-hour surveillance system (guards, facility personnel, or television). *Private Security*
2. Artificial or natural barriers to control entry (fence around active portions of facility) AND a means to control entry (attendants, locked entrances or controlled roadway access).

Y

664.0014(2)

Photo ☐

B. "Danger - Unauthorized Personnel Keep Out" signs are posted at entrances and other locations.

Y

664.0014(3)

Photo ☐

C. Facility conducts inspections to determine if problems exist which could cause an environmental or human health hazard.

Y

664.0015(1)

Photo ☐

D. Inspections are conducted frequently enough to identify and correct problems before they harm human health or the environment.

Y

664.0015(1)

Photo ☐



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Section 9: Security and General Inspection Requirements

E. Facility is following a written inspection schedule for the following equipment: 1. Monitoring equipment. 2. Safety and emergency equipment. 3. Security devices. 4. Operating and structural equipment.	Y	664.0015(2)(a) Photo <input type="checkbox"/>
F. Facility looks for problems identified in the inspection schedule during their inspections.	Y	664.0015(2)(c) Photo <input type="checkbox"/>
G. Problems are remedied on a schedule that ensures they do not lead to environmental or human health hazards.	Y	664.0015(3) Photo <input type="checkbox"/>
H. Written inspection log is maintained at the facility for at least 3 years.	Y	664.0015(4) Photo <input type="checkbox"/>
I. Inspection logs include ALL of the following: 1. Date and time of inspection. 2. Name of inspector. - <i>Howe Glen?</i> 3. Notation of the observations made. 4. Date and nature of repairs or remedial actions.	N <i>One / no time!</i>	664.0015(4) Photo <input type="checkbox"/>

Section 10: Personnel Training Requirements

A. Facility has a program of classroom instruction or on-the-job training for personnel in hazardous waste management.	Y	664.0016(1)(a) Photo <input type="checkbox"/>
B. Program is directed by a person trained in hazardous waste management procedures. <i>Tracy in A 270641 -</i>	Y	664.0016(1)(b) Photo <input type="checkbox"/>
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed.	Y	664.0016(1)(b) Photo <input type="checkbox"/>
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items: 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	664.0016(1)(c) Photo <input type="checkbox"/>
E. New employees are trained within 6 months of their assignment.	Y	664.0016(2) Photo <input type="checkbox"/>
F. Employees work in supervised positions until they complete the training.	Y	664.0016(2) Photo <input type="checkbox"/>
G. Personnel take part in an annual review of the training. <i>Ronald Kluge -</i>	Y	664.0016(3) Photo <input type="checkbox"/>



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Section 10: Personnel Training Requirements

H. Facility keeps ALL of the following training documents:

1. Job title and the employee name for each position related to hazardous waste management.
2. Job description of each of the above job titles.
3. Description of the amount and type of introductory and continuing training that will be given to each employee.
4. Records that required training has been given to each employee.

Y

664.0016(4)

Photo ☐

I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility.

Y

664.0016(5)

Photo ☐

Section 11: Ignitable, Reactive or Incompatible Waste

A. Facility treats or stores ignitable, reactive or incompatible waste. If NO, go to Section 12.

Y

Photo ☐

B. Facility takes precautions to prevent accidental ignition or reaction in the following ways:

1. Separate and protect waste from sources of ignition or reaction.
2. Confine smoking and open flame to specially designated locations.
3. Conspicuously place "No Smoking" signs where there is a hazard from ignitable or reactive wastes.

Y

664.0017(1)

Photo ☐

C. Facility treats, stores, or mixes ignitable, reactive, or incompatible wastes so that the waste does not result in any of the following:

1. Generate extreme heat or pressure, fire, or explosion, or violent reaction.
2. Produce uncontrolled toxic mists, fumes, dust or gases in sufficient quantities to threaten human health.
3. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a fire or explosion risk.
4. Damage the structural integrity of the device or facility containing the waste.
5. Otherwise threaten human health or the environment.

Y

664.0017(2)

Photo ☐

D. Containers of ignitable or reactive waste are located at least 50 feet from the property line.

Y

664.0176

Photo ☐

E. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers

Y

664.0177(1)

Photo ☐

F. Containers that previously held waste are washed before adding incompatible waste.

NA

664.0177(2)

Photo ☐

G. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device).

Y

664.0177(3)

Photo ☐

Section 12: Container Standards

A. Facility stores or treats hazardous waste in containers. If NO, go to Section 13.

Y

Photo ☐

B. If a container is leaking or in poor condition, the contents are transferred to another container in good condition.

Y

664.0171

Photo ☐



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Section 12: Container Standards

C. Containers are made or lined with materials that are compatible with the waste.	Y	664.0172
		Photo <input type="checkbox"/>
D. Containers are kept closed, except when it is necessary to add or remove waste.	Y	664.0173(1)
		Photo <input type="checkbox"/>
E. Containers are opened, handled or stored to prevent ruptures or leaks.	Y	664.0173(2)
		Photo <input type="checkbox"/>
F. Container storage areas are inspected weekly for leaks and deterioration.	Y	664.0174
		Photo <input type="checkbox"/>
G. Inspections of the container storage areas are documented in an inspection log.	Y	664.0015(4)
		Photo <input type="checkbox"/>
H. Base of the containment system is free of cracks and sufficiently impervious to contain leaks.		664.0175(2)(a)
		Photo <input type="checkbox"/>
I. Waste and accumulated precipitation are removed from the sump or collection area in a timely manner to prevent overflow of the collection system.	Y	664.0175(2)(e)
		Photo <input type="checkbox"/>

Section 13: Subchapter AA Standards for Process Vents

A. The facility conducts distillation, fractionation, thin-film evaporation, solvent extraction, air stripping operations or steam stripping operations in units managing hazardous waste. If NO, go to Section 14.	Y	
		Photo <input type="checkbox"/>
B. The facility has determined that the process vents are not subject to subch. AA by making an initial determination that the time-weighted, annual average total organic concentration of the waste managed in the above units is <10 ppmw by direct measurement of the organic concentration of the waste calculated as an arithmetic mean from 4 grab samples OR by knowledge of the waste.	N/A	664.1034(4)
		Photo <input type="checkbox"/>
C. If knowledge of the waste was used, the facility maintains ANY of the following: 1. Documentation showing no organic compounds are used in the process. 2. Documentation showing that another identical process generates waste with < 10 ppmw total organic content. 3. If based on prior analysis, documentation showing there has been no change to the process that would affect total organic concentration. 4. Other similar documentation.	N/A	664.1034(4)
		Photo <input type="checkbox"/>
D. If the facility determined that the average total organic concentration is <10 ppmw, the determination has been made according to ALL of the following: 1. When the waste was first managed in the waste management unit or when the facility became subject to subch. AA. 2. Annually thereafter for continuously generated waste. 3. When there was a change in the waste managed or a change in the process generating or treating the waste.	N/A	664.1034(5)
		Photo <input type="checkbox"/>
E. The operating record includes the information used to determine that the time weighted, annual average total organic concentration managed in the waste management unit is <10 ppmw.	N/A	664.1035(6)
		Photo <input type="checkbox"/>



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Section 13: Subchapter AA Standards for Process Vents

F. The facility has determined they are not subject to subch. AA because they have certified that all process vents are equipped with air emission controls operating according to the process vent requirements in the Clean Air Act. <i>Comply under NR 400</i>	Y	664.1030(5) Photo <input type="checkbox"/>
G. All process vents are excluded from subch. AA requirements because the average total organic concentration is <10 ppmw or because the vents are equipped with air emission controls. If YES, go to Section 14.	Y	 Photo <input type="checkbox"/>
H. The total organic emissions from all process vents subject to subch. AA have been reduced to EITHER of the following: 1. Below 3 lb/hr and 3.1 tons/yr. 2. By 95 weight percent using a control device.	NA	664.1032(1) Photo <input type="checkbox"/>
I. Vent emissions and emission reductions or total organic compound concentrations are achieved by add-on control devices that are based on engineering calculations or performance tests.		664.1032(3) Photo <input type="checkbox"/>
J. When knowledge of the waste or process is used to determine if the process vent is subject to subch. AA standards, the operating log includes ALL of the following information which is based on engineering calculations or performance tests: 1. Vent emissions. 2. Emission reduction rates. 3. Total organic compound concentrations achieved by add-on control devices.		664.1035(6) Photo <input type="checkbox"/>
K. The facility uses a closed-vent system and control device to reduce total organic emissions. If YES, complete the inspection form, "TSD Subch. AA & BB Standards for Closed Vent Systems and Control Devices".	Y	 Photo <input type="checkbox"/>

Section 14: Subchapter BB Standards for Equipment Leaks

A. The facility operates any of the following equipment that contains or contacts hazardous wastes with organic concentrations $\geq 10\%$ by weight. If NO, go to Section 15. 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	Y	 Photo <input type="checkbox"/>
B. The equipment listed in Question 14.A is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 664.1064(7)(e)).	Y	664.1050(5) Photo <input type="checkbox"/>
C. The equipment listed in Question 14.A is excluded from subch. BB requirements because it operates < 300 hours per calendar year AND is identified, either by list or location (area or group), in the facility operating record. <i>EX</i>	N/A	664.1050(6) Photo <input type="checkbox"/>
D. If the facility determines compliance with subch. BB by documenting compliance with the Clean Air Act requirements, the documentation is readily available as part of the operating record.	Y	664.1064(13) Photo <input type="checkbox"/>



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Section 14: Subchapter BB Standards for Equipment Leaks

E. The following information used to determine the applicability of the exclusions in Questions 14.A - 14.D is recorded in the operating log:

1. Analysis determining the design capacity of the hazardous waste management unit.
2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids.
3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.

Y

664.1064(11)

Photo ☐

F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following is recorded in the operating log:

1. Information that the production process does not use organic compounds.
2. The process is identical to a process at another facility where the total organic content was measured at <10%
3. The process has not changed to affect the total organic concentration of the waste.

Y

664.1064(11)

Photo ☐

G. The operating log includes new determinations which are performed when changes could result in an increase in the total organic content of the waste in contact with equipment determined not to be subject to subch. BB requirements.

Y

664.1064(11)

Photo ☐

H. All of the equipment listed in Question 14.A is excluded from additional subch. BB requirements. If NO, complete the TSD subch. BB inspection form.

Y

Photo ☐

Section 15: Subchapter CC Level 1 Standards for Containers

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 15.V (NR 664.1086(2)(a)).

1. Between 26 and 119 gallons.
2. Greater than 119 gallons that are not in light material service.

Y

Photo ☐

B. Containers are exempt from subch. CC because of ALL of the following (NR 664.1083(1), NR 664.1082(3)(a)):

1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container.
 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container.
 3. The initial determination is reviewed and updated at least once every 12 months.
 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to 500 ppmw.
 5. The average VO concentration is determined by direct measurement or by knowledge.
- Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.

N

Photo ☐

C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records.

Y

664.1089(6)(a)

Photo ☐

D. Containers are exempt from subch. CC because of EITHER of the following (NR 664.1082(3)):

1. The organic content of all waste entering the container has been reduced by an organic destruction or removal process described in NR 664.1082(3).
2. The hazardous organic constituents of the waste placed in the container have been treated to meet LDR standards.

N

Photo ☐



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Section 15: Subchapter CC Level 1 Standards for Containers

E. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 664.1080(4)).

N

Photo ☐

Note: Certain records must be maintained. Refer to NR 664.1089(9) for more information.

F. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 664.1080(2)):

N

Photo ☐

1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities.
2. Radioactive mixed wastes in accordance with NRC requirements.

G. Containers are excluded from subchapter CC because of BOTH of the following (NR 664.1080(2), NR 664.1089(10)):

Y

Photo ☐

1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements.
2. Facility records include a certification of such by the owner or operator and the specific air program compliance requirements for the containers.

H. All containers managed at the facility are excluded from subch. CC level 1 requirements. If YES, go to Question 15.V.

N

Photo ☐

I. Any of the following controls are used on all Level 1 containers subject to subch. CC:

Y

664.1086(3)(a)

Photo ☐

1. Container meets applicable US DOT packaging requirements.
2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container.
3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere.

Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.

J. Level 1 containers that do not meet applicable US DOT packaging requirements are equipped with covers and closure devices composed of suitable materials that result in BOTH of the following:

N/A

664.1086(3)(b)

Photo ☐

1. Minimize exposure of hazardous waste to the atmosphere.
2. Maintain integrity of the covers and closure devices.

K. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded.

Y

664.1086(3)(c)

Photo ☐

L. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs:

N/A

664.1086(3)(c)

Photo ☐

1. No additional material will be added within 15 minutes.
2. The person performing the loading operation leaves the immediate vicinity of the container.
3. The process generating the waste shuts down.

M. If Level 1 containers are opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs:

N/A

664.1086(3)(c)

Photo ☐

1. No additional materials will be removed within 15 minutes.
2. The person removing the waste leaves the immediate vicinity of the container.

N. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity.

N/A

664.1086(3)(c)

Photo ☐



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Section 15: Subchapter CC Level 1 Standards for Containers

O. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met: 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	Y	664.1086(3)(c) Photo <input type="checkbox"/>
P. Safety valves are only opened to avoid an unsafe condition.	Y	664.1086(3)(c) Photo <input type="checkbox"/>
Q. When first taking possession of a Level 1 container that will not be emptied within 24 hours, the facility visually inspects the container, cover and closure device for visible cracks, holes, gaps or other open spaces on or before the date the facility accepts the container (e.g., signs the manifest).	Y	664.1086(3)(d) Photo <input type="checkbox"/>
R. If a Level 1 container remains at the facility for one year or more, the container, its cover and closure devices are visually inspected initially and at least once every 12 months for cracks, gaps or other open spaces.	Y	664.1086(3)(d) Photo <input type="checkbox"/>
S. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days.	Y	664.1086(3)(d) Photo <input type="checkbox"/>
T. If repairs cannot be completed in 5 days, the waste is removed from the container which is not used until it is repaired.	Y	664.1086(3)(d) Photo <input type="checkbox"/>
U. Inspections records for subchapter CC containers are maintained in the operating log for at least 3 years.	Y	664.0015(2)(d) Photo <input type="checkbox"/>
V. If a facility managed hazardous waste with an average VO concentration >500 ppmw or without adequate reduction of the organic content by an organic destruction or removal process in a container exempt from subch. CC level 1, 2 or 3 standards, the facility submitted a written report to the department which includes all of the following information: 1. Name of the facility, EPA ID#, and address. 2. A description of the noncompliance event and the cause. 3. The dates of noncompliance. 4. The actions taken to correct the noncompliance and prevent reoccurrence.	N/A	664.1090(1) Photo <input type="checkbox"/>
W. The report in Question 15.V is submitted within 15 calendar days of the time the owner or operator becomes aware of the occurrence.	N/A	664.1090(1) Photo <input type="checkbox"/>

Section 16: Subchapter CC Level 2 Standards for Containers

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 17.	Y	Photo <input type="checkbox"/>
B. Any of the following controls are used on Level 2 containers: 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60. <i>DOT signed</i>	Y	665.1087(4)(a) Photo <input type="checkbox"/>



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Section 16: Subchapter CC Level 2 Standards for Containers

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51.	Y	665.1087(5)(b)1 Photo <input type="checkbox"/>
D. If the potential leak interface on the containers were checked, BOTH of the following were met: 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.	Y	665.1087(4)(a) Photo <input type="checkbox"/>
E. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service.	Y	665.1087(3)(e) Photo <input type="checkbox"/>
F. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices.	Y	665.1087(4)(b) Photo <input type="checkbox"/>
G. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded.	Y	665.1087(4)(c)1.a Photo <input type="checkbox"/>
H. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	N/A	665.1087(4)(c)1.b Photo <input type="checkbox"/>
I. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	N/A	665.1087(4)(c)2.b Photo <input type="checkbox"/>
J. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity.	Y	665.1087(4)(c)3 Photo <input type="checkbox"/>
K. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	Y	665.1087(4)(c)4 Photo <input type="checkbox"/>
L. Safety valves are only opened to avoid an unsafe condition.	Y	665.1087(4)(c)5 Photo <input type="checkbox"/>
M. When a defect is detected, initial repair efforts are made within 24 hours of detection.	Y	665.1087(4)(d)3 Photo <input type="checkbox"/>
N. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired.	Y	665.1087(4)(d)3 Photo <input type="checkbox"/>



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Section 17: Subchapter CC Level 3 Standards for Containers

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 18.	Y	Photo <input type="checkbox"/>
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device.	Y	665.1087(5)(a) Photo <input type="checkbox"/>
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51.	Y	665.1087(5)(b)1 Photo <input type="checkbox"/>
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility.	Y	665.1090(4)(a) Photo <input type="checkbox"/>
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices.	Y	665.1087(5)(f) Photo <input type="checkbox"/>

Section 18: Financial Responsibility

A. The facility maintains the following proof mechanism for closure: 1. Closure trust fund 2. Surety bond 3. Letter of credit 4. Insurance 5. Net worth test 6. Deposit with the department 7. Escrow account 8. Multiple financial mechanisms	Y	664.0143 Photo <input type="checkbox"/>
B. The facility complies with EITHER of the following: 1. The amount of the proof mechanism being maintained is adequate to cover the most recent closure cost estimate. 2. The facility is taking steps to increase the financial assurance to cover the closure costs within 60 days of a cost increase.	Y	664.0143 Photo <input type="checkbox"/>
C. The facility has the following type of liability coverage for sudden accidental occurrences: 1. Insurance 2. Financial test 3. Guarantee 4. Letter of credit 5. Surety bond 6. Trust fund 7. Multiple financial mechanisms	Y	664.0147(1) Photo <input type="checkbox"/>
D. Indicate the date of the most recent financial review done by the Department.		
E. The Department found that the financial responsibility for closure and liability coverage was adequate during the most recent financial review.	Y	Photo <input type="checkbox"/>

Section 19: License Requirements

A. Facility is in compliance with the conditions of their license.	N	670.032 Photo <input type="checkbox"/>
B. Facility has not exceeded capacity limits for storage or treatment units.	Y	670.032 Photo <input type="checkbox"/>



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Section 19: License Requirements

C. Facility notified the Department or requested a modification to their license, as required, for any changes at the facility.

Y

670.042

Photo ☐

Section 20: Waste Minimization

A. Facility has a program to reduce the volume and toxicity of hazardous waste generated to the greatest economical degree possible.

Y

664.0073(2)(i)

Photo ☐

B. A waste minimization certification is signed at least annually and is maintained in the facility's operating record. *See H*

Y

664.0073(2)(i)

Photo ☐

C. Facility includes waste minimization information in its annual report.

Y

664.0075

Photo ☐

Section 21: Used Oil

A. Used oil is managed on-site. If NO, go to Section 22 *THANK YOU*

Y

Photo ☐

B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met. *See H*

Y

679.10(2)(a)2

Photo ☐

C. Used oil containers and tanks are in good condition and not leaking. *OFF-SITE - only used on site. Self used oil -*

Y

679.22(2)

Photo ☐

D. Used oil containers and tanks are marked "used oil". *THANK YOU*

N

679.22(3)(a)

Photo ☐

E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement. *will be third party*

Y

679.24

Photo ☐

F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill. *Consisted + dump material*

Y

Photo ☐

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:
1. Only used oil from the generator or household do-it-yourselfers is burned.
2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.
3. The combustion gases are vented to the ambient air.

N

679.23

Photo ☐

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

Y

679.11

Photo ☐

Section 22: Facility Status Evaluation

A. Describe any other activities the facility is conducting. *Hydro - pulp*

Photo ☐



TREATMENT & STORAGE FACILITY INSPECTION - TANK SYSTEM

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This Inspection Form Supplement, used in conjunction with the TREATMENT AND STORAGE FACILITY INSPECTION REPORT, is for the inspection of facilities that are accumulating hazardous waste in licensed tank(s) at the facility.

Section 1: Assessment of an Existing Tank System's Integrity

A. If the tank was installed before March 1, 1991 and does not meet the secondary containment requirements in Section 3, there is a written assessment, certified by a PE, on file at the facility that determines the tank system is adequately designed and has sufficient structural strength and compatibility with the wastes to be stored or treated so that it will not collapse, rupture or fail.

Date of the assessment: _____

If the tank was installed after March 1, 1991, go to Section 2.

N/A

664.0191(1)

Photo ☐

B. The written assessment considers ALL of the following:

1. Design standards for construction of the tank and ancillary equipment.
2. Hazardous characteristics for the wastes handled.
3. Corrosion protection measures.
4. The age of the tank system, either documented or estimated.

Results of a leak test, internal inspection or other tank integrity examination.

N/A

664.0191(2)

Photo ☐

Section 2: Design and Installation of a New Tank System

A. If the tank was installed after March 1, 1991, written statements regarding the certification of the design of the tank and the supervision of its installation are kept at the facility. If the tank was installed before March 1, 1991, go to Section 3.

Y

664.0192(7)

Photo ☐

B. Ancillary equipment is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction.

Y

664.0192(5)

Photo ☐

C. Corrosion protection is provided to ensure the integrity of the tank system.

Y

664.0192(6)

Photo ☐

D. Underground components are completely backfilled with noncorrosive, porous and homogenous material that is compacted so the tank and piping are fully and uniformly supported.

N/A

664.0192(3)

Photo ☐

Section 3: Containment & Detection of Releases

A. The tank system meets BOTH of the following (NR 664.0190(1)). If YES, go to Section 4.

1. Located inside a building with an impermeable floor.
2. Stores or treats hazardous waste that does not contain free liquids.

Y

Photo ☐

B. The secondary containment system meets ALL of the following:

1. Constructed of or lined with materials that are compatible with the wastes placed in the tank.
2. Has sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions and stresses of daily operation.
3. Placed on a foundation or base that provides support to the secondary containment system and is capable of preventing failure due to settlement, compression or uplift.
4. Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation.

Y

664.0193(3)

Photo ☐

C. The leak detection system is designed and operated to detect EITHER of the following:

1. The failure of either the primary or secondary containment structure.
2. The presence of a release within 24 hours or the earliest practicable time if a release cannot be detected within 24 hours.

Y

664.0193(3)

Photo ☐

D. Spilled waste and accumulated precipitation are removed from the secondary containment system within 24 hours or in a timely manner if removal within 24 hours cannot be accomplished.

Y

664.0193(3)(d)

Photo ☐



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Section 3: Containment & Detection of Releases

E. External liner system meets ALL of the following: 1. Designed or operated to contain 100% of the capacity of the largest tank. 2. Designed or operated to prevent run-on or infiltration of precipitation unless the collection system has capacity to contain precipitation from a 25 year, 24 hour storm. 3. Free of cracks and gaps. 4. Designed and installed to surround the tank completely and cover all surrounding earth likely to come in contact with the waste.	Y	664.0193(5)(a) Photo <input type="checkbox"/>
F. Vault system meets ALL of the following: 1. Designed and operated to contain 100% of the capacity of the largest tank. 2. Designed or operated to prevent run-on or infiltration of precipitation unless the collection system has capacity to contain precipitation from a 25 year, 24 hour storm. 3. Constructed with chemical resistant water stops in place at all joints. 4. Provided with an impermeable interior coating or lining that is compatible with the stored waste and will prevent migration of waste into the concrete. 5. Provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is stored or treated. 6. Provided with an exterior moisture barrier or otherwise designed or operated to prevent migration of moisture into the vault if the vault is subject to hydraulic pressure.	N/A	664.0193(5)(b) Photo <input type="checkbox"/>
G. Double-walled tank meets ALL of the following: 1. Designed as an integral structure so that the outer shell contains any release from the inner tank. 2. If constructed of metal, protected from corrosion of the primary tank interior and of the external surface of the outer shell. 3. Provided with a built-in continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time.	N/A	664.0193(5)(c) Photo <input type="checkbox"/>
H. The Department approved an equivalent type of secondary containment device if the device is not an external liner, vault system or double-walled tank.	N/A	664.0193(4)(d) Photo <input type="checkbox"/>
I. All ancillary equipment has secondary containment (trench, jacketing, double walled piping) except for the following when they are visually inspected for leaks on a daily basis: 1. Aboveground piping, excluding flanges, joints, valves and other connections. 2. Welded flanges, welded joints and welded connections. 3. Sealless or magnetic coupling pumps and sealless valves. 4. Pressurized aboveground piping systems with automatic shut-off devices (excess flow check valves, flow metering shutdown devices, loss of pressure actuated shut-off devices).	Y	664.0193(6) Photo <input type="checkbox"/>
J. If the tank system does not meet the above secondary containment system requirements, the owner or operator has complied with the following: 1. For non-enterable underground tanks, conduct a leak test at least annually. 2. For other than non-enterable underground tanks, conduct a leak test OR have a PE develop a schedule and procedure for assessing the overall condition of the tank system at a frequency to be determined by the operating conditions of the tank system. 3. For ancillary equipment, conduct a leak test or other integrity assessment at least annually. 4. The results of the assessments are maintained in the facility file.	N/A	664.0193(9) Photo <input type="checkbox"/>

Section 4: General Operating Requirements

A. Hazardous waste or treatment reagents that are placed into the tank system will not cause the tank, ancillary equipment or containment system to rupture, leak, corrode, or otherwise fail.	Y	664.0194(1) Photo <input type="checkbox"/>
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Section 4: General Operating Requirements

B. The following controls and practices are used to prevent spills and overflows from the tank or containment system: 1. Spill prevention controls (check valves or dry disconnect couplings). 2. Overfill prevention controls (level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank). 3. Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind actions or precipitation.	Y	664.0194(2) Photo <input type="checkbox"/>
C. The facility clearly marks each tank, or records in the operating record, ALL of the following information: 1. A description of the tank contents. 2. The quantity of each hazardous waste received. 3. The date each period of accumulation begins.	Y	668.50(1)(b)2 Photo <input type="checkbox"/>
D. Hazardous waste is stored in tanks for less than one year.	Y	668.50(2) Photo <input type="checkbox"/>
E. If waste is stored in tanks for more than one year, the facility can prove that storage was necessary to facilitate proper recovery, treatment or disposal.	N/A	668.50(3) Photo <input type="checkbox"/>

Section 5: Inspections

A. Overfill control equipment (waste-feed cutoff systems, bypass systems and drainage systems) is inspected according to their facility's inspection schedule.	Y	664.0195(1) Photo <input type="checkbox"/>
B. ALL of the following are inspected at least once each operating day: 1. Aboveground portions of the tank system to detect corrosion or releases of waste. 2. Data gathered from monitoring and leak detection equipment (pressure or temperature gauges, monitoring wells) to ensure that the tank system is operated according to its design. 3. The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of hazardous waste releases (wet spots, dead vegetation).	Y	664.0195(2) Photo <input type="checkbox"/>
C. Cathodic protection systems are inspected according to BOTH of the following: 1. The proper operation of the cathodic protection system is confirmed within 6 months of the initial installation and annually thereafter. 2. All sources of impressed current are inspected and/or tested at least every other month.	N/A	664.0195(3) Photo <input type="checkbox"/>
D. The inspection results are documented in the operating record.	Y	664.0195(4) Photo <input type="checkbox"/>

Section 6: Response to Leak and Spills

A. There has been a spill or leak from the tank system or containment system. If NO, go to Section 7.	NO	Photo <input type="checkbox"/>
B. The tank system or secondary containment system was removed from service immediately.	N/A	664.0196 Photo <input type="checkbox"/>
C. The flow of hazardous waste into the tank system or secondary containment system was stopped immediately and the system was inspected to determine the cause of the release.	N/A	664.0196(1) Photo <input type="checkbox"/>



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Section 6: Response to Leak and Spills

D. If the release was from the tank system, the owner or operator performed BOTH of the following: 1. Removed as much waste as necessary to prevent further releases. 2. Allowed inspection and repair of the tank system within 24 hours after detection or at the earliest practicable time.	N/A	664.0196(2)(a) Photo <input type="checkbox"/>
E. If material was released to a secondary containment system, all released material was removed within 24 hours or in a timely manner to prevent harm to human health and the environment.	N/A	664.0196(2)(b) Photo <input type="checkbox"/>
F. The owner or operator did ALL of the following: 1. Conduct a visual inspection of the release. 2. Prevent further migration of the spill to soils or surface water. 3. Remove and properly dispose of any visible soil or surface water contamination.	N/A	664.0196(3) Photo <input type="checkbox"/>
G. The release was reported to the Department within 24 hours of its detection, except when less than one pound was released and the material was contained and cleaned up immediately.	N/A	664.0196(4) Photo <input type="checkbox"/>
H. Written report was submitted to the Department within 30 days of detecting the release.	N/A	664.0196(4)(c) Photo <input type="checkbox"/>
I. The following actions were taken: 1. If the integrity of the tank system was not damaged, the system was returned to service after cleanup and repairs. 2. If the leak was from the tank system into secondary containment, the system was repaired before the tank was returned to service. 3. If the leak was from a component that did not have secondary containment, either secondary containment was provided or repairs were made if the component can be visually inspected.	N/A	664.0196(5) Photo <input type="checkbox"/>
J. If major repairs were made to the tank system, a PE certification was obtained and submitted to the Department within 7 days of returning the tank system to use.	N/A	664.0196(6) Photo <input type="checkbox"/>

Section 7: Special Requirements for Ignitable, Reactive or Incompatible Wastes

A. Ignitable, reactive or incompatible waste is stored or treated in tanks. If NO, go to Section 8.	Y	 Photo <input type="checkbox"/>
B. The waste is treated or mixed before or immediately after placed in a tank system so that ALL of the following apply: 1. Extreme heat, pressure, fire, explosions or reactions are not produced. 2. Uncontrolled toxic or flammable fumes or gases are not produced. 3. The structural integrity of the tank system is not damaged. 4. Other means are taken so human health or the environment is not threatened. 5. The waste no longer meets the definition of ignitable or reactive waste.	Y	664.0198(1)(a) Photo <input type="checkbox"/>
C. Ignitable or reactive waste is stored or treated in a way to protect it from any material or conditions that may cause the waste to ignite or react.	Y	664.0198(1)(b) Photo <input type="checkbox"/>
D. The tank system is only used to treat or store ignitable or reactive waste during an emergency.	N/A	664.0198(1)(c) Photo <input type="checkbox"/>
E. Buffer zone requirements between the tanks and any public ways or adjoining property lines are in compliance with the NFPA standards in the Flammable and Combustible Liquids Code.	Y	664.0198(2) Photo <input type="checkbox"/>



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Section 7: Special Requirements for Ignitable, Reactive or Incompatible Wastes

F. The tank system is decontaminated before adding an incompatible waste.

Y

664.0199(2)

Photo ☐

Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

A. Hazardous waste tanks are excluded from subch. CC requirements because of BOTH of the following (NR 664.1082(3)(a)):

N

Photo ☐

1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the tank.
2. The initial determination of the average VO concentration is reviewed and updated at least once every 12 months.

B. Waste determinations for excluded tanks are made according to ALL of the following:

1. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the tank.

Y

664.1083(1)

Photo ☐

2. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to ≥ 500 ppmw.
3. The average VO concentration is determined by direct measurement or by knowledge.

Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.

C. For each waste determination, the date, time and location of each waste sample collected are maintained in the facility records.

Y

664.1089(6)(a)

Photo ☐

D. Tanks are excluded from CC requirements because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 664.1080(4)).

N

Photo ☐

Note: Certain records are to be maintained. Refer to NR 664.1089(9) for more information.

E. Hazardous waste tanks are excluded from CC requirements because of the following (NR 664.1080(2)):

Y

Photo ☐

1. Waste is no longer added to the tank and closure has been implemented or completed.
2. The tank is used solely to store or treat on-site remediation wastes generated through NR 700 or RCRA corrective action activities OR radioactive mixed wastes in accordance with NRC requirements.
3. The tank is equipped with air emission controls operating in accordance with the Clean Air Act requirements AND the facility records include a certification signed by the owner or operator and the specific air program compliance requirements for the unit.
4. If an enclosure is used as the air emission control, the enclosure is in compliance with the enclosure and control device requirements unless the tank bulk feeds to an incinerator.
5. The tank has a process vent subject to Subch. AA requirements.

F. Hazardous waste tanks are excluded from CC regulation because of any of the following (NR 664.1082(3)):

N

Photo ☐

1. The organic content of all waste entering the tank has been reduced by an organic destruction or removal process described in NR 664.1082(3).
2. The hazardous organic constituents placed in the tank are treated to meet LDR standards.
3. The tank is in an enclosure that vents to a control device and bulk feeds to an incinerator.

G. All tanks are excluded from subch. CC requirements. If YES, go to Section 9.

Y

Photo ☐



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Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

H. The maximum organic vapor pressure of the hazardous waste managed in a fixed roof tank is less than the maximum organic vapor pressure limit for the tank's design capacity category as follows (NR 664.1084(2)(a)). If NO, go to Question ZA. 1. Tank design capacity is $\geq 40,000$ gallons and the maximum organic vapor pressure limit for the tank is 0.75 psi (5.2 kPa). 2. Tank design capacity is between 20,000 to 40,000 gallons and the maximum organic vapor pressure limit for the tank is 4.0 psi (27.6 kPa). 3. Tank design capacity is $<20,000$ gallons and the maximum organic vapor pressure limit for the tank is 11.1 psi (76.6 kPa).	664.1084(2)(a) Photo <input type="checkbox"/>
I. The maximum organic vapor pressure of the hazardous waste managed in the tank is determined according to ALL of the following: 1. The maximum organic vapor pressure is determined before the waste is first placed in the tank. 2. A new determination is performed when changes to the hazardous waste could cause the maximum organic vapor pressure to increase to or exceed the maximum vapor pressure for the tank design capacity. 3. The maximum organic vapor pressure was determined by either direct measurement or knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	664.1084(3)(a) Photo <input type="checkbox"/>
J. If the maximum organic vapor pressure was determined by direct measurement, ALL of the following information is maintained in the facility records: 1. The date and time of sample collection. 2. The analytical method and results.	664.1089(2)(b) Photo <input type="checkbox"/>
K. If the maximum organic vapor pressure was determined by direct measurement, a copy of the written sampling plan is on file.	664.1083(3)(c) Photo <input type="checkbox"/>
L. If the maximum organic vapor pressure was determined by knowledge, the facility records include the information used as the basis for knowing that the maximum organic vapor pressure limit of the hazardous waste is less than the maximum vapor pressure limit listed for the applicable tank design capacity category.	664.1083(3)(d) Photo <input type="checkbox"/>
M. The tank is equipped with a fixed roof and closure devices to form a continuous barrier over the entire surface area of the hazardous waste in the tank.	664.1084(3)(b) Photo <input type="checkbox"/>
N. The fixed roof is EITHER of the following: 1. A separate cover installed on the tank (a removable cover mounted on an open-top tank). 2. An integral part of the tank structural design (horizontal cylindrical tank equipped with a hatch).	664.1084(3)(b)1 Photo <input type="checkbox"/>
O. The fixed roof is installed in a manner so there are no cracks, holes, gaps or other open spaces visible between the roof section joints or between the interface of the roof edge and tank wall.	664.1084(3)(b)2 Photo <input type="checkbox"/>
P. Each opening in the fixed roof and any manifold system for the fixed roof is EITHER of the following: 1. Equipped with a closure device that, when closed, has no visible cracks, holes, gaps or other open spaces. 2. Connected by a closed-vent system to a control device that is operating whenever hazardous waste is managed in the tank, except during routine inspections and maintenance.	664.1084(3)(b)3 Photo <input type="checkbox"/>
Q. The closure devices and fixed roof are made of materials that minimize the release of hazardous waste to the atmosphere and maintain the integrity of the roof and closure devices.	664.1084(3)(b)4 Photo <input type="checkbox"/>



TREATMENT & STORAGE FACILITY INSPECTION - TANK SYSTEM

Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

R. Each closure device is secured in the closed position and the fixed roof installed except when inspections and maintenance are performed or tank sludge is removed.

664.1084(3)(c)1

Photo ☐

S. If the tank is equipped with a pressure relief device which vents to the atmosphere, the pressure relief device is operated according to BOTH of the following:
1. There are no detectable organic emissions (<500 ppmv) when the pressure relief device is closed.

664.1084(3)(c)2

Photo ☐

2. The pressure relief device is only opened during normal operations to maintain the tank internal pressure according to tank design specifications.

T. Safety devices are only opened when necessary to avoid unsafe conditions.

664.1084(3)(c)3

Photo ☐

U. The fixed roof and closure devices are visually inspected at least once every year for the following defects, at a minimum, that could result in air pollutant emissions:

664.1084(3)(d)

Photo ☐

1. Visible cracks, holes or gaps in the roof sections or between the roof and tank wall.
2. Damaged seals or gaskets on closure devices.
3. Broken or missing hatches, access covers, caps or other closure devices.

V. If inspections are conducted at intervals longer than one year, the fixed roof or closure device has been designated as "unsafe to inspect and monitor".

664.1084(12)

Photo ☐

W. If the fixed roof or closure device has been designated as "unsafe to inspect and monitor", ALL of the following information is recorded in a log:

664.1089(7)

Photo ☐

1. The identification numbers for the roof or closure device with covers that are designated as "unsafe to inspect and monitor".
2. A written explanation stating the reasons why the roof or closure device is unsafe to visually inspect or monitored.
3. A written plan and schedule for inspecting and monitoring the roof or closure device as frequently as practical when a worker can gain safe access.

X. First efforts of repair are made within 5 calendar days of detection and completed no later than 45 calendar days of detection unless repair is delayed.

664.1084(11)

Photo ☐

Y. Repair is delayed until the next time the process or unit generating the waste stops operation because the tank must be emptied for repair and there is no alternate tank capacity.

664.1084(1)

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Z. Inspection records are maintained for at least 3 years and include ALL of the following:

664.1084(3)(d)4

Photo ☐

1. Tank ID#.
2. Date of inspection.
3. Location and description of the defect.
4. Date the problem was detected and the corrective action taken.
5. The reason repair was delayed and the date of completion, if applicable.

ZA. The facility manages hazardous waste in any of the following tanks (NR 664.1084(2)(b)). If YES, complete the Subch. CC Level 2 and 3 Standards for Containers and Tanks inspection form.

664.1090(2)

Photo ☐

1. Hazardous waste in the tank has a maximum organic vapor pressure greater or equal to the maximum limit for the tank's design capacity category as stated in Question H.
2. Tank is used for a waste stabilization process.
3. Hazardous waste in the tank is heated to a temperature greater than the temperature at which the vapor pressure was determined.
4. Tank has a fixed roof with an internal floating roof.
5. Tank has an external floating roof.
6. Tank is subject to subch. CC and vented to a control device.
7. Tank is a pressure tank.
8. Tank is located inside an enclosure.



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ZB. If the facility managed hazardous waste with an average VO concentration >500 ppmw or without adequate reduction of the organic content by an organic destruction or removal process in a tank exempt from subch. CC level 1 standards, a written report was submitted to the department within 15 calendar days of the time the owner or operator becomes aware of the occurrence which includes ALL of the following information:

1. The facility name, address and EPA identification number.
2. A description of the noncompliance event.
3. The cause and dates of the noncompliance.
4. The actions taken to correct the noncompliance.
5. The actions taken to prevent the reoccurrence of the noncompliance.

ZC. If hazardous waste with an organic vapor pressure exceeding the maximum organic vapor pressure limit for the tank design capacity has been placed in a tank with level 1 standards, a written notification was submitted to the department within 15 calendar days of the time the owner or operator becomes aware of the occurrence that contains, at a minimum, the following information:

1. The facility name, address and EPA identification number.
2. A description of the noncompliance event.
3. The cause and dates of the noncompliance.
4. The actions taken to correct the noncompliance.
5. The actions taken to prevent the reoccurrence of the noncompliance.

ZD. If hazardous waste is transferred from one tank to another tank subject to level 1 or level 2 standards, continuous hard-piping or another closed system that does not allow exposure of hazardous waste to the atmosphere is used, except under any of the following conditions:

1. The average VO concentration at the point of waste origination is <500 ppmw and is determined at least once every 12 months.
2. Hazardous waste has been treated to a specified concentration by an organic or biological destruction or removal process.
3. The organic constituents of the hazardous waste placed in the tank are treated to meet the LDR treatment standards.

664.1090(1)

Photo ☐

664.1090(2)

Photo ☐

664.1084(10)

Photo ☐

Section 9: Facility Status Evaluation

A. The facility conducts hazardous waste activities other than tank storage or treatment. If YES, complete the appropriate inspection forms (container storage, universal waste, used oil, etc.)

Y

Photo ☐



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This Inspection Form, used for the inspection of facilities that generate over 1000 kg (2205 lbs) of non acute hazardous waste in a calendar month or over 1 kg of acute hazardous waste in a calendar month, evaluates compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Information

A. Hazardous waste determination has been made on each solid waste generated.	Y	662.011 Photo <input type="checkbox"/>
B. Waste determination was made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3) Photo <input type="checkbox"/>
C. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	Y	662.011(3)(a)1 Photo <input type="checkbox"/>
D. Generator keeps records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3) Photo <input type="checkbox"/>
E. Generator submitted a notification form and obtained an EPA ID#. Note: A subsequent notification should be submitted when there is an ownership or name change.	Y	662.012 Photo <input type="checkbox"/>

Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

A. Generator initiated a manifest with all off-site shipments of hazardous waste.	Y	662.020(1) Photo <input type="checkbox"/>
B. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1) Photo <input type="checkbox"/>
C. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2) Photo <input type="checkbox"/>
D. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	Y	662.023(3) Photo <input type="checkbox"/>
E. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1) Photo <input type="checkbox"/>
F. If the generator received a shipment back as a rejected load, the returned waste was accumulated in compliance with the container or tank standards for less than 90 days.	Y	662.034(13) Photo <input type="checkbox"/>
G. Upon receipt of the rejected shipment, the generator signed EITHER of the following: 1. Manifest Item 18c if the transporter returned the shipment using the original manifest. 2. Manifest Item 20 if the transporter returned the shipment using a new manifest.	Y	662.034(13) Photo <input type="checkbox"/>
H. A copy of the manifest signed by the generator is retained until the signed copy from the designated facility is received.	Y	662.040(1) Photo <input type="checkbox"/>
I. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1) Photo <input type="checkbox"/>
J. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030 Photo <input type="checkbox"/>



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Section 2: Manifest, Pre-Transport Requirements and Off-Site Shipments

K. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031 Photo <input type="checkbox"/>
L. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1) Photo <input type="checkbox"/>
M. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2) Photo <input type="checkbox"/>
N. Placards are offered to the initial transporter.	Y	662.033 Photo <input type="checkbox"/>

Section 3: Land Disposal Restrictions

A. Generator determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo <input type="checkbox"/>
B. Generator complies with the prohibition against dilution of wastes.	Y	668.03 Photo <input type="checkbox"/>
C. A one-time written notice was sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo <input type="checkbox"/>
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo <input type="checkbox"/>
E. If the waste MEETS treatment standards, the LDR notice certifies wastes may be land disposed without further treatment.	Y	668.07(1) Photo <input type="checkbox"/>
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and applicable prohibitions.	Y	668.07(1) Photo <input type="checkbox"/>
G. A copy of the LDR notifications and certifications are retained for at least 3 years from the date the waste was last sent off-site.	Y	668.07(1)(h) Photo <input type="checkbox"/>
H. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo <input type="checkbox"/>
I. Generator identifies EITHER of the following when the waste is both a listed and characteristic waste: 1. The treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste codes. 2. The treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2) Photo <input type="checkbox"/>
J. If waste is treated in containers or tanks, the generator meets BOTH of the following (NR 668.07(1)(e): 1. Developed a written waste analysis plan describing the procedures used to meet applicable LDR treatment standards. 2. Complies with the certification requirements in NR 668.07(1)(c).	Y	662.034(1)(d) Photo <input type="checkbox"/>



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Section 4: Annual Reports and Exception Reporting

A. Annual reports covering generator activities during the calendar year have been submitted to the Department by March 1 of the following year.	Y	662.041 Photo <input type="checkbox"/>
B. Transporter or TSD is contacted if signed manifest is not received in 35 days.	Y	662.042(1) Photo <input type="checkbox"/>
C. Exception report is submitted to the Department if a signed manifest is not received within 45 days.	Y	662.042(2) Photo <input type="checkbox"/>
D. Copy of each annual report and exception report is kept for at least 3 years from the date of the report.	Y	662.040(2) Photo <input type="checkbox"/>

Section 5: Preparedness and Prevention

A. Generator has ALL of the following, unless the equipment is not necessary for the types of wastes handled (NR 665.0032): 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	662.034(1)(d) Photo <input type="checkbox"/>
B. All of the above emergency equipment is tested and maintained to assure its proper operation in an emergency (NR 665.0033).	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas (NR 665.0034).	Y	662.034(1)(d) Photo <input type="checkbox"/>
D. Generator has made ALL of the following arrangements with emergency organizations (NR 665.0037): 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	662.034(1)(d) Photo <input type="checkbox"/>
E. Aisle space provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment (NR 665.0035).	Y	662.034(1)(d) Photo <input type="checkbox"/>

Section 6: Contingency Plan and Emergency Procedures

A. Generator has a written contingency plan, amended SPCC plan or other emergency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge (NR 665.0051). If there is no written plan go to question 7.A.	Y	662.034(1)(d) Photo <input type="checkbox"/>
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Section 6: Contingency Plan and Emergency Procedures

B. Generator has amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions (NR 665.0052(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams. (NR 665.0052(3)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
D. Contingency plan was amended due to ANY of the following (NR 665.0054): 1. Contingency plan failed in an emergency. 2. Change in site design, construction, O&M, or other circumstances which affect emergency response. 3. Emergency coordinators changed. 4. Emergency equipment changed.	Y	662.034(1)(d) Photo <input type="checkbox"/>
E. Contingency plan identifies an emergency coordinator who meets ALL of the following (NR 665.0055): 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	662.034(1)(d) Photo <input type="checkbox"/>
F. Contingency plan includes ALL of the following (NR 665.0052): 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion, or hazardous waste discharge. 6. List of emergency equipment at the site, including location, description and capabilities of each item.	Y	662.034(1)(d) Photo <input type="checkbox"/>
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous wastes (NR 665.0056): 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the site stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	662.034(1)(d) Photo <input type="checkbox"/>



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Section 7: Personnel Training Requirements

A. Generator has a program of classroom instruction or on-the-job training for personnel in hazardous waste management (NR 665.0016(1)(a)). If there is no training program go to question 8.A.	Y	662.034(1)(d) Photo <input type="checkbox"/>
B. Program is directed by a person trained in hazardous waste management procedures (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed (NR 665.0016(1)(b)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items (NR 665.0016(1)(c)): 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	662.034(1)(d) Photo <input type="checkbox"/>
E. New employees are trained within 6 months of their assignment (NR 665.0016(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
F. Employees work in supervised positions until they have completed the training (NR 665.0016(2)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
G. Personnel take part in an annual review of the training (NR 665.0016(3)).	Y	662.034(1)(d) Photo <input type="checkbox"/>
H. Generator keeps ALL of the following training documents (NR 665.0016(4)): 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description for each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	662.034(1)(d) Photo <input type="checkbox"/>
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility (NR 665.0016(5)).	Y	662.034(1)(d) Photo <input type="checkbox"/>

Section 8: 90-Day Container Accumulation

A. Waste is accumulated in containers. If NO, go to Section 9.	Y	Photo <input type="checkbox"/>
B. Accumulation start date is clearly marked and visible for inspection on each container.	Y	662.034(1)(b) Photo <input type="checkbox"/>
C. All containers are clearly marked with the words "Hazardous Waste".	Y	662.034(1)(c) Photo <input type="checkbox"/>



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Section 8: 90-Day Container Accumulation

D. If container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
E. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
F. Containers are kept closed, except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
G. Containers are opened, handled or stored to prevent leaks or ruptures (NR 665.0173(2)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
H. Container storage areas are inspected weekly for leaks and deterioration (NR 665.0174).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
I. Containers of ignitable or reactive waste are located at least 50 feet from the property line (NR 665.0176).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
J. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device) (NR 665.0177(3)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
K. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(1)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
L. Containers that previously held waste are properly washed before adding incompatible waste, unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers (NR 665.0177(2)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>

Section 9: Subchapter BB Standards for Equipment Leaks

A. Generator operates any of the following equipment containing or contacting hazardous wastes with organic concentration $\geq 10\%$ by weight. If NO, go to Section 10 (NR 662.034(1)(a), NR 665.1050(2)). 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service. 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	Y	 Photo <input type="checkbox"/>
B. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 665.1050(4), NR 665.1064(7)(e)).	Y	662.034(1)(a) Photo <input type="checkbox"/>
C. Equipment listed in Question 9.A. is excluded from subch. BB requirements because it operates < 300 hours per calendar year and is identified, either by list or location (area or group), in the facility operating record. (NR 665.1050(5), NR 665.1064(7)(f)).	N	662.034(1)(a) Photo <input type="checkbox"/>
D. If the facility determines compliance with subch. BB by documenting compliance with Clean Air Act requirements, the documentation is readily available as part of the operating record (NR 665.1064(13)).	Y	662.034(1)(a) Photo <input type="checkbox"/>



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Section 9: Subchapter BB Standards for Equipment Leaks

E. ALL of the following information used to determine the applicability of exclusions in Questions 9.B. - 9.D. is maintained at the facility (NR 665.1064(11)): 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.	Y	662.034(1)(a) Photo <input type="checkbox"/>
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following are maintained at the facility (NR 665.1064(11)): 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10%. 3. The process has not changed to affect the total organic concentration of the waste.	Y	662.034(1)(a) Photo <input type="checkbox"/>
G. The facility keeps records of new determinations performed when there are any changes that could result in an increase in the total organic content of the waste in contact with equipment that is not subject to subch. BB requirements (NR 665.1064(11)).	Y	662.034(1)(a) Photo <input type="checkbox"/>
H. All equipment stated in Question 9.A. is excluded from additional subch. BB requirements. If NO, complete the subch. BB inspection form.	N	 Photo <input type="checkbox"/>

Section 10: Subchapter CC Level 1 Container Standards

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 10.R. (NR 665.1087(2)(a), NR 662.034(1)(a)1). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons and not in light material service.	Y	 Photo <input type="checkbox"/>
B. Containers are exempt from CC regulation because of ALL of the following (NR 662.034(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)1, NR 665.1083(3)(a), NR 665.1084(1)(a)2., NR 665.1084(1)(b)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	N	 Photo <input type="checkbox"/>
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records (NR 665.1090(6)(a)).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
D. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 662.034(1)(a)1, NR 665.1080(4)). Note: Certain records are to be maintained. Refer to 665.1090(9) for more information.	N	 Photo <input type="checkbox"/>
E. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 662.034(1)(a)1, NR 665.1080(2), NR 665.1090(10)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements	N	 Photo <input type="checkbox"/>



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Section 10: Subchapter CC Level 1 Container Standards

F. Containers are excluded from subch. CC because BOTH of the following are met (NR 665.1080(2), NR 665.1090.(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include certification of such by the owner or operator and the <u>specific air</u> program compliance requirements for the containers	Y	<input type="checkbox"/> Photo <input type="checkbox"/>
G. All containers are excluded from subch. CC Level 1 standards. If YES, go to Question 10.R.	N	<input type="checkbox"/> Photo <input type="checkbox"/>
H. Any of the following controls are used on all Level 1 containers (NR 665.1087(3)(a)): 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
I. If Level 1 containers do not meet applicable US DOT packaging requirements, they are equipped with covers and closure devices composed of suitable materials that minimize exposure of hazardous waste to the atmosphere and maintain integrity of the covers and closure devices (NR 665.1087(3)(b)).	N/A	662.034(1)(a)1 Photo <input type="checkbox"/>
J. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded (NR 665.1087(3)(c)1.a).	N/A	662.034(1)(a)1 Photo <input type="checkbox"/>
K. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs (NR 665.1087(3)(c)1.b): 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	N/A	662.034(1)(a)1 Photo <input type="checkbox"/>
L. If a Level 1 container is opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs (NR 665.1087(3)(c)2b): 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	N/A	662.034(1)(a)1 Photo <input type="checkbox"/>
M. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity (NR 665.1087(3)(c)3).	N/A	662.034(1)(a)1 Photo <input type="checkbox"/>
N. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met (NR 665.1087(3)(c)4): 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. 3. The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	N/A	662.034(1)(a)1 Photo <input type="checkbox"/>
O. Safety valves are only opened to avoid an unsafe condition (NR 665.1087(3)(c)5).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>
P. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days (NR 665.1087(3)(d)3).	Y	662.034(1)(a)1 Photo <input type="checkbox"/>



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Section 10: Subchapter CC Level 1 Container Standards

Q. If repairs cannot be completed in 5 days of detecting the defect, the waste is removed from the container which is not used until it is repaired (NR 665.1087(3)(d)3).

Y

662.034(1)(a)1

Photo ☐

Section 11: Subchapter CC Level 2 Container Standards

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 12.

Y

Photo ☐

B. Any of the following controls are used on Level 2 containers: (NR 665.1087(4)(a))

Y

662.034(1)(a)2

Photo ☐

1. Container meets applicable US DOT packaging requirements.
2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring.
3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.

C. If the potential leak interface on the containers were checked, BOTH of the following were met: (NR 665.1087(4)(a))

Y

662.034(1)(a)2

Photo ☐

1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve.
2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.

D. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service. (NR 665.1087(3)(e))

Y

662.034(1)(a)2

Photo ☐

E. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(4)(b))

Y

662.034(1)(a)2

Photo ☐

F. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded. (NR 665.1087(4)(c)1.a.)

Y

662.034(1)(a)2

Photo ☐

G. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: (NR 665.1087(4)(c)1.b.)

Y

662.034(1)(a)2

Photo ☐

1. No additional material will be added within 15 minutes.
2. The person performing the loading operation leaves the immediate vicinity of the container.
3. The process generating the waste shuts down.

H. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: (NR 665.1087(4)(c)2.b.)

Y

662.034(1)(a)2

Photo ☐

1. No additional materials will be removed within 15 minutes.
2. The person removing the waste leaves the immediate vicinity of the container.

I. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity. (NR 665.1087(4)(c)3.)

Y

662.034(1)(a)2

Photo ☐



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Section 11: Subchapter CC Level 2 Container Standards

J. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: (NR 665.1087(4)(c)4.) 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	Y	662.034(1)(a)2 Photo <input type="checkbox"/>
K. Safety valves are only opened to avoid an unsafe condition. (NR 665.1087(4)(c)5.)	Y	662.034(1)(a)2 Photo <input type="checkbox"/>
L. When a defect is detected, initial repair efforts are made within 24 hours of detection. (NR 665.1087(4)(d)3.)	Y	662.034(1)(a)2 Photo <input type="checkbox"/>
M. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired. (NR 665.1087(4)(d)3.)	Y	662.034(1)(a)2 Photo <input type="checkbox"/>

Section 12: Subchapter CC Level 3 Container Standards

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 13.	N/A	 Photo <input type="checkbox"/>
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device. (NR 665.1087(5)(a))		662.034(1)(a)2 Photo <input type="checkbox"/>
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51. (NR 665.1087(5)(b)1.)		662.034(1)(a)2 Photo <input type="checkbox"/>
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility. (NR 665.1090(4)(a))		662.034(1)(a)2 Photo <input type="checkbox"/>
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices. (NR 665.1087(5)(f))		662.034(1)(a)2 Photo <input type="checkbox"/>

Section 13: Satellite Accumulation

A. Waste is accumulated in satellite accumulation areas. If NO, go to Section 14.	Y	 Photo <input type="checkbox"/>
B. Generator accumulates no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area.	Y	662.034(3)(a) Photo <input type="checkbox"/>
C. Satellite containers are under the control of the operator of the process generating the waste.	Y	662.034(3)(a) Photo <input type="checkbox"/>
D. Containers are made of or lined with materials that are compatible with the waste (NR 665.0172).	Y	662.034(3)(a)1 Photo <input type="checkbox"/>



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Section 13: Satellite Accumulation

E. If a container is leaking or in poor condition, the contents are transferred to another container in good condition (NR 665.0171).	Y	662.034(3)(a)1 Photo <input type="checkbox"/>
F. Containers are kept closed except when it is necessary to add or remove waste (NR 665.0173(1)).	Y	662.034(3)(a)1 Photo <input type="checkbox"/>
G. Containers are marked "Hazardous Waste" or with other words that identify the contents.	Y	662.034(3)(a)2 Photo <input type="checkbox"/>
H. Container holding the excess waste is marked with the date the excess amount begins accumulating.	Y	662.034(3)(b) Photo <input type="checkbox"/>
I. Generator complies with the 90 day accumulation requirements with respect to the excess amount within 3 days of it being generated.	Y	662.034(3)(b) Photo <input type="checkbox"/>

Section 14: Waste Minimization

A. Generator includes waste minimization information in the annual report.	Y	662.041(3)(e) Photo <input type="checkbox"/>
B. Generator has a program in place to reduce the volume or quantity and toxicity of waste to an economically practicable degree. Note: The inspector should look for evidence justifying the generator's waste minimization certification on the manifest. Also, EPA guidance recommends that the generator have a written waste minimization/pollution prevention plan.	Y	662.027(1) Photo <input type="checkbox"/>

Section 15: Used Oil

A. Used oil is managed on-site. If NO, go to Section 16	Y	 Photo <input type="checkbox"/>
B. Used oil containing $\geq 1,000$ ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.	Y	679.10(2)(a)2 Photo <input type="checkbox"/>
C. Used oil containers and tanks are in good condition and not leaking.	Y	679.22(2) Photo <input type="checkbox"/>
D. Used oil containers and tanks are marked "used oil". <i>Think w/w</i>	N	679.22(3)(a) Photo <input type="checkbox"/>
E. Transporter has an EPA ID number, except when generator self-transport or has a tolling agreement.	Y	679.24 Photo <input type="checkbox"/>
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.	Y	 Photo <input type="checkbox"/>



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Section 15: Used Oil

G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met:
1. Only used oil from the generator or household do-it-yourselfers is burned.
2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less.
3. The combustion gases are vented to the ambient air.

N/A

679.23

Photo ☐

H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.

Y

679.11

Photo ☐

Section 16: F006 Wastewater Treatment Sludge

A. Generator accumulates F006 sludge for more than 90 days. If NO, go to Section 17.

N/A

Photo ☐

B. The F006 waste is accumulated for no more than 180 days, unless the waste is shipped 200 miles or more.

662.034(7)

Photo ☐

C. Pollution prevention practices are in place to reduce the amount of contaminants entering the F006 waste.

662.034(7)(a)

Photo ☐

D. The F006 waste is legitimately recycled through metals recovery.

662.034(7)(b)

Photo ☐

E. No more than 20,000 kg (44,100 lbs) of F006 waste is accumulated on-site.

662.034(7)(c)

Photo ☐

F. Accumulation containers meet subch. I, AA, BB and CC standards in ch. NR 665.

662.034(7)(d)1.a

Photo ☐

G. The accumulation start date is clearly marked and visible for inspection on each container.

662.034(7)(d)3

Photo ☐

H. Accumulation tanks meet subch. J, AA, BB and CC standards in ch. NR 665, except for NR 665.0197(3) and NR 665.0200.

662.034(7)(d)1.b

Photo ☐

I. Each container and tank of F006 waste is clearly marked with the words "Hazardous Waste".

662.034(7)(d)4

Photo ☐

J. A containment building used for accumulation meets subch. DD standards in ch. NR 665; a P.E. certification stating compliance with the design standards is in the operating record AND written procedures and documentation for emptying the unit within 180 days are on file.

662.034(7)(d)1.c

Photo ☐

K. The accumulation of F006 waste is included in the preparedness and prevention procedures, contingency plan and personnel training program.

662.034(7)(d)5

Photo ☐

L. If waste is accumulated for up to 270 days, the generator must ship the waste over 200 miles for metals recovery.

662.034(8)

Photo ☐



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Section 17: Generator Status Evaluation

A. Waste is accumulated for less than 90 days, except as allowed in Sections 13 and 16.

Y

662.034(1)

Photo ☐

B. More than 2,205 lbs. of non-acute hazardous waste; 2.2 lbs. of acute hazardous waste; or, 220 lbs. of residue from cleanup of an acute hazardous waste spill is generated in any month (NR 662.190(1), NR 662.220(4)).

Y

Photo ☐

C. Describe other activities that the generator conducts at the facility (accumulation in tanks, recycling, 10-day transfer, transporter, used oil, treatment, storage, disposal, universal waste, etc.).

Photo ☐

D. If waste was previously accumulated in a tank system, the generator performed EITHER of the following (NR 665.0197(1), NR 665.0197(2)):

N/A

662.034(1)(a)2

Photo ☐

1. Closure by removing or decontaminating waste residues, contaminated containment system components, soils, structures and equipment.

2. Initiated long-term care if all contaminated soils cannot be practicably removed or decontaminated.



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UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANTITY HANDLER

This Inspection Form, used for the inspection of facilities that generate or handle 5000 kg or more of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.

Y

673.31(1)

Photo ☐

B. Universal waste is not diluted or treated on-site.

Y

673.31(2)

Photo ☐

Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and not leaking.

Y

673.33

Photo ☐

B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.

Y

673.33

Photo ☐

C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.

Y

673.33(1)(b)

Photo ☐

D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.

Y

673.33

Photo ☐

E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following:

Y

673.33(3)(b)

Photo ☐

1. Ampules are removed in a manner that prevents breakage.
2. Removal is conducted over a containment device.
3. Spills or leaks are cleaned up immediately.
4. Removal is performed in a well ventilated, monitored environment.

F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.

Y

673.33(2)

Photo ☐

G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.

Y

673.33(2)

Photo ☐

H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".

Y

673.34

Photo ☐

I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.

Y

673.34

Photo ☐

J. Length of accumulation time is demonstrated by ANY of the following:

1. Mark or label each container with the earliest date the waste is generated or received.
2. Mark or label the individual item of waste with the date it was generated or received.
3. Maintain an inventory system identifying the date the waste was generated or received.
4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received.
5. Use some other method that clearly demonstrates the length of accumulation time.

Y

673.35(3)

Photo ☐

K. Universal waste is accumulated for less than one year from the date generated or received from another handler.

N

673.35(1)

Photo ☐

see notes - 11/2/2011 used lamp



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UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANTITY HANDLER

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	N	673.35(2)	Photo <input type="checkbox"/>
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.36	Photo <input type="checkbox"/>
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	Y	673.37	Photo <input type="checkbox"/>
O. EPA ID# was obtained before meeting or exceeding 5,000 kg (11,025 lb).	Y	673.32(1)	Photo <input type="checkbox"/>

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler. <i>Waste recycling</i>	Y	673.38(1)	Photo <input type="checkbox"/>
B. Handler that self-transportes complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	N/A	673.38(2)	Photo <input type="checkbox"/>
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	Y	673.38(3)	Photo <input type="checkbox"/>
D. If shipping to another universal waste handler, the handler has agreed to receive the shipment.	Y	673.38(4)	Photo <input type="checkbox"/>
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	Y	673.38	Photo <input type="checkbox"/>
F. The handler immediately notifies the Department if they receive a shipment containing hazardous waste.	Y	673.38(7)	Photo <input type="checkbox"/>
G. Nonhazardous, nonuniversal waste in a universal waste shipment is managed in compliance with the solid waste requirements.	Y	673.38(8)	Photo <input type="checkbox"/>

Section 4: Record Keeping

A. Records for each shipment of universal waste received at the facility contains ALL of the following information: 1. The name and address of the originating handler or foreign shipper. 2. The quantity of each type of universal waste received. 3. The date the shipment was received.	Y	673.39(1)	Photo <input type="checkbox"/>
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UNIVERSAL WASTE HANDLER INSPECTION REPORT - LARGE QUANTITY HANDLER

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Section 4: Record Keeping

B. Records for each shipment of universal waste sent off-site contains the following information

1. The name and address of the facility to which the waste was sent.
2. The quantity of each type of universal waste sent.
3. The date the shipment of universal waste left the facility.

Y

673.39(2)

Photo ☐

C. Records are retained for at least 3 years from the date the shipment was received or from the date the shipment left the facility.

Y

673.39(3)

Photo ☐



revision: 10/06/2011
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USED OIL - MARKETERS

This Inspection Form, used for the inspection of facilities that market used oil, evaluates facility compliance with Wisconsin's Used Oil Rules in ch. NR 679 subch. H, Wis. Adm. Code. A used oil marketer directs off-specification used oil to a used oil burner or first claims that the used oil to be burned for energy recovery meets the used oil fuel specifications.

Section 1: General Requirements

A. The marketer submitted a notification form and obtained an EPA ID number.	Y	679.73	Photo <input type="checkbox"/>
B. The marketer made a determination that the used oil to be burned for energy recovery meets the fuel specifications by performing analyses or obtaining copies of other information indicating the specifications are met.	Y	679.72(1)	Photo <input type="checkbox"/>
C. The marketer only initiates shipments of off-specification used oil to a used oil burner who has an EPA ID number and burns the used oil in an industrial furnace or boiler.	Y	679.71	Photo <input type="checkbox"/>

Section 2: Recordkeeping

A. The marketer maintains a record (log, invoice, manifest or bill of lading) for each shipment of off-specification used oil shipped to a used oil burner that includes ALL of the following information: 1. Name, address and EPA ID number of the transporter delivering the used oil. 2. Name, address and EPA ID number of the burner receiving the used oil. 3. Quantity of used oil shipped. 4. Date of shipment.	Y	679.74(1)	Photo <input type="checkbox"/>
B. Records used to determine the used oil meets fuel specifications are maintained at the facility for 3 years.	Y	679.72(2)	Photo <input type="checkbox"/>
C. The facility maintains a record for each off-site shipment of on-specification used oil which includes ALL of the following information: 1. Name and address of the facility receiving the shipment. 2. Quantity of used oil delivered. 3. Date of shipment or delivery. 4. A cross-reference to the record of used oil analysis or other information used to determine that the used oil meets fuel specifications.	Y	679.74(2)	Photo <input type="checkbox"/>
D. Records of shipments are maintained for at least 3 years.	Y	679.74(3)	Photo <input type="checkbox"/>
E. Before accepting the first shipment of off-specification used oil fuel, the burner provided the marketer a one-time written and signed notice certifying BOTH of the following: 1. The department has been notified of the location and general description of the burner's used oil management activities. 2. Used oil will only be burned in an industrial furnace or boiler.	Y	679.75(1)	Photo <input type="checkbox"/>
F. The written certification from the burner is maintained at the facility for at least 3 years from the date the last shipment of off-specification used oil was shipped to the burner.	Y	679.75(2)	Photo <input type="checkbox"/>



Photograph #1 – On-site Laboratory, Two 55-Gallon Hazardous Waste Containers



Photograph #2 – On-Site Laboratory, Three Satellite Accumulation Area Containers



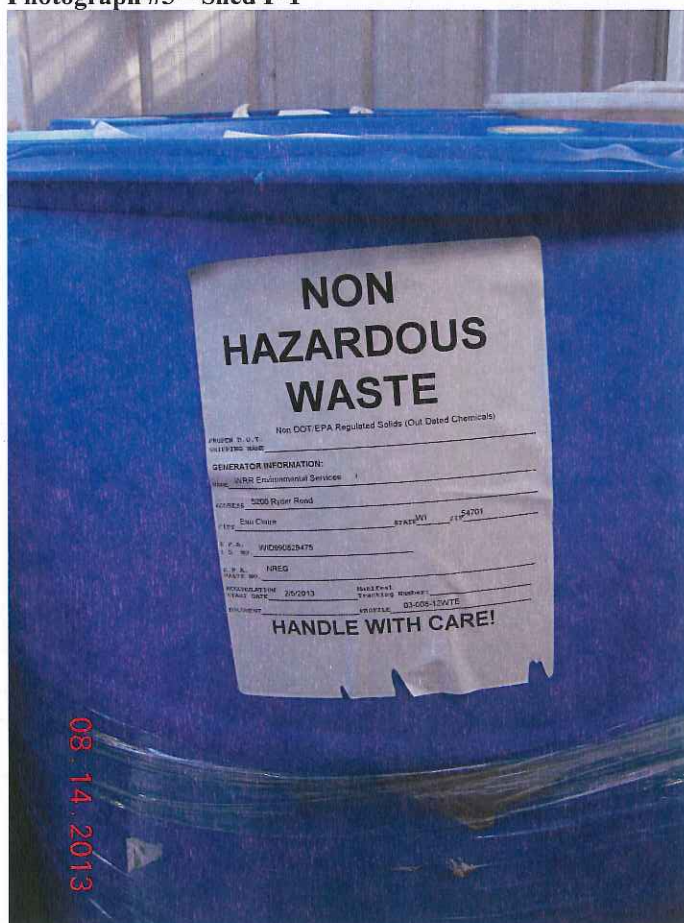
Photograph #3 – E-1 North Tank Farm



Photograph #4 – Clean Sweep Room, Household Hazardous Waste Accumulation Area



Photograph #5 – Shed P-1



Photograph #6 – Shed P-3, 55-Gallon Container of Non-Hazardous Waste



Photograph #7 – Dock 5, 55-Gallon Waste Containers and Totes



Photograph #8 – Outside Fuels Building, Crushed Barrel Dumpster



Photograph #9 – South of Remediation Building, WPDES Outfall



Photograph #10 – Remediation Building/Southside Property Boundary, WPDES Runoff



Photograph #11 – Pole Shed, Universal Waste Accumulation Area



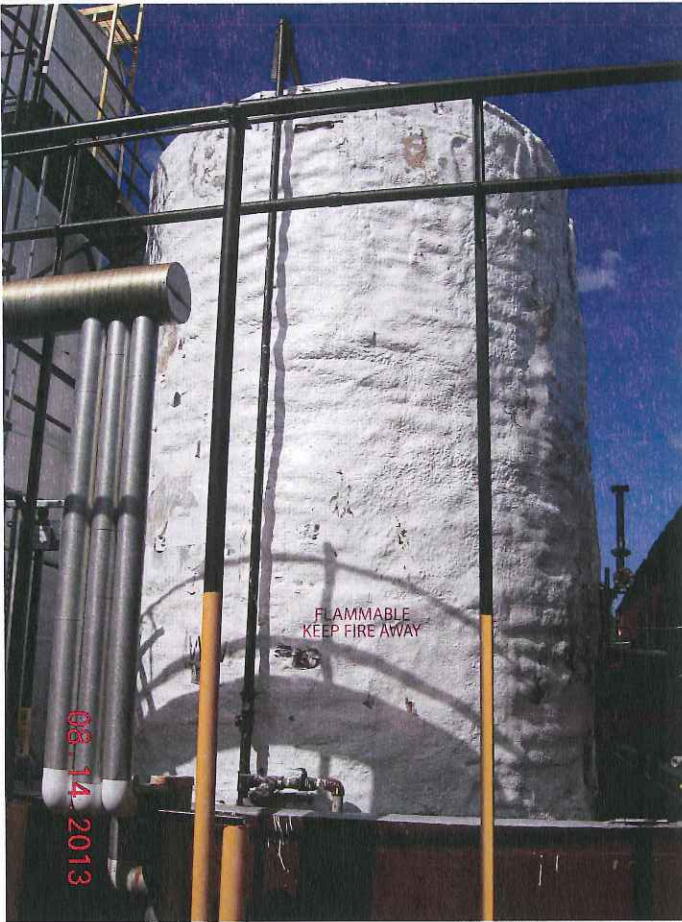
Photograph #12 – Fuels Building, Hydra Pulper



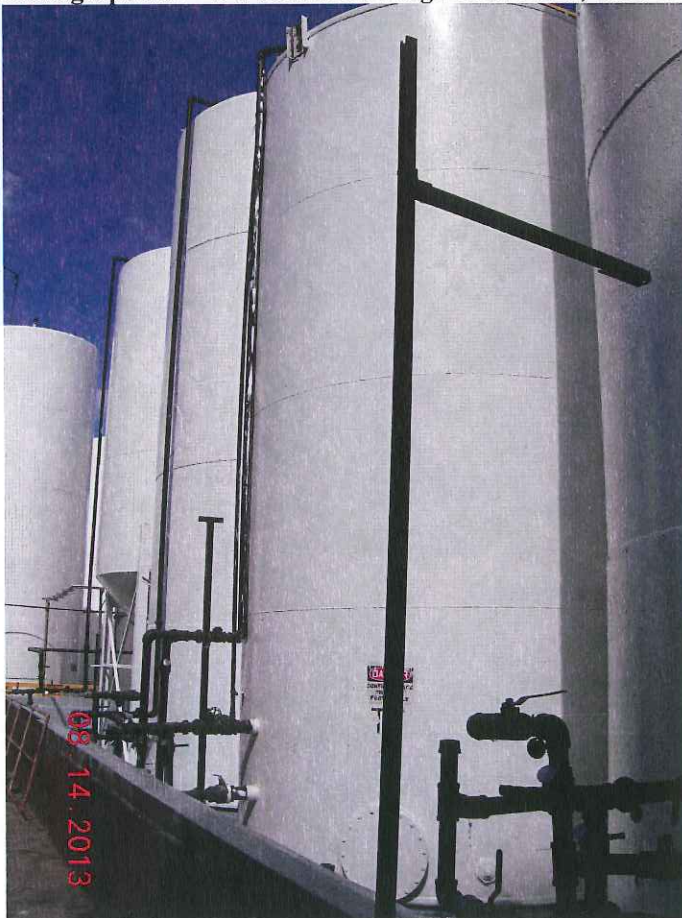
Photograph #13 – E-II Sludge Tank Farm



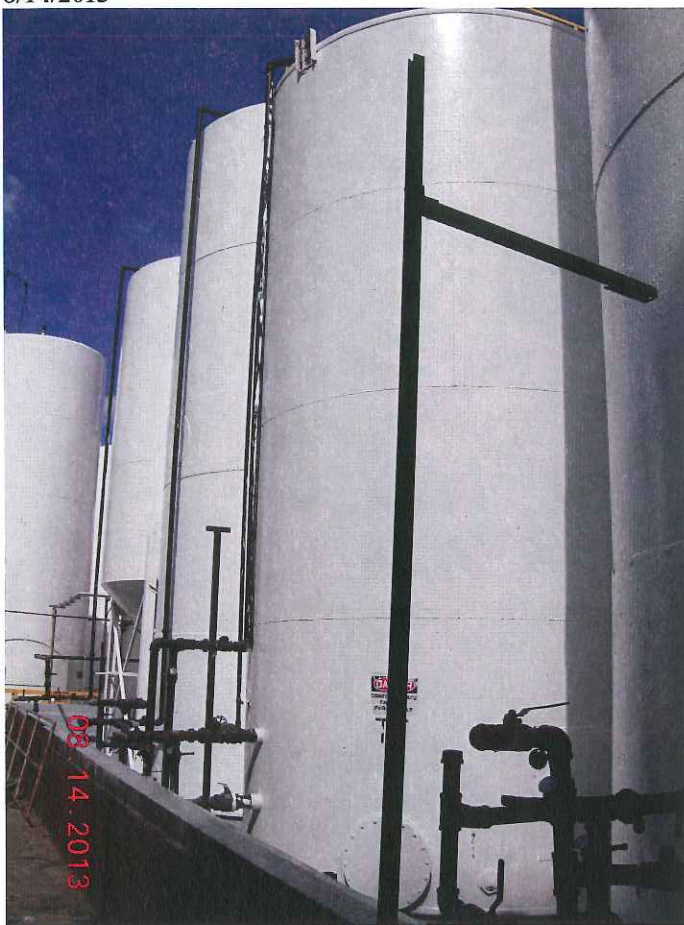
Photograph #14 – E-IV Thin Film Evaporator



Photograph #15 – E-1 South Loc Forge Tank Farm, Used Oil Tank WW



Photograph #16 – E-1 North Tank Farm



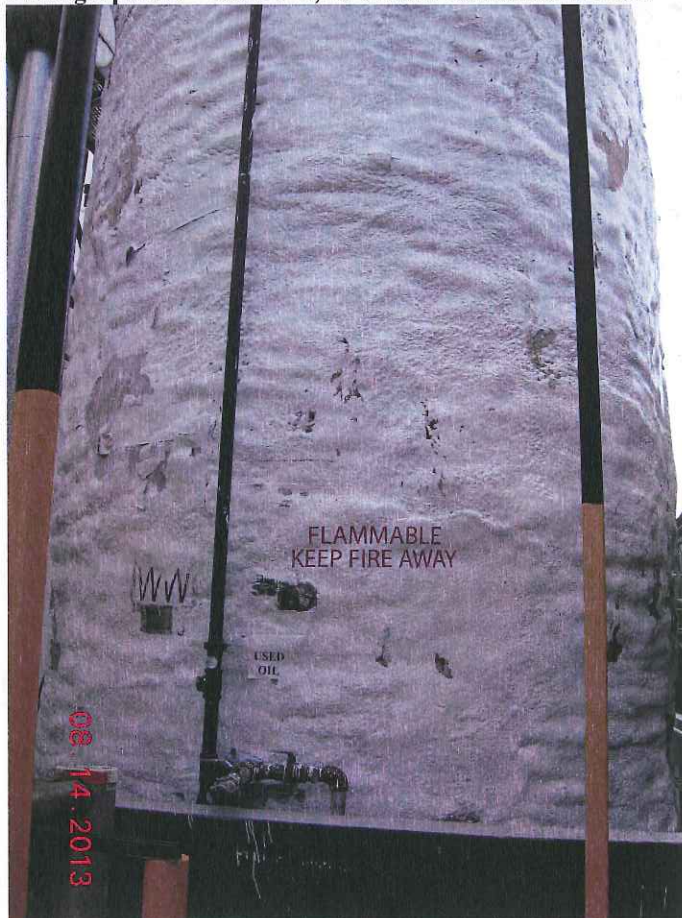
Photograph #17 – E-1 North Tank Farm



Photograph #18 – Shed P-1, 55-Gallon Container of D001



Photograph #19 – Shed P-1, 55-Gallon Container of D001



Photograph #20 – E-1 South Loc Forge Tank Farm, Used Oil Tank WW

